

FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	
Call Authentication Trust Anchor)	WC Docket No. 17-97
)	
Rules and Regulations Implementing)	CG Docket No. 02-278
the Telephone Consumer Protection Act)	
)	
Dismissal of Outdated or Otherwise Moot)	CG Docket No. 25-307
Robocalls Petitions)	

Reply Comments of

National Consumer Law Center
on behalf of its low-income clients

National Consumers League

Consumer Action

and

Electronic Privacy Information Center

Table of Contents

Introduction and Summary	1
I. The Commission should not mandate the presentation of caller name until it can be trusted.....	2
II. Prohibiting spoofing of U.S. phone numbers by foreign callers will help prevent scam calling campaigns and boost domestic investment.....	4
III. The Commission should amend its consent revocation rules to encourage easy, automated opt-out mechanisms that are clearly disclosed to the called party.....	8
Conclusion	10

Reply Comments

Introduction and Summary

These Reply Comments, submitted by the National Consumer Law Center (NCLC) on behalf of its low-income clients, and joined by National Consumers League, Consumer Action, and the Electronic Privacy Information Center, are submitted in response to the Further Notices of Proposed Rulemaking and Public Notice released by the Federal Communications Commission (Commission or FCC) on October 29, 2025,¹ and published in the Federal Register on December 5, 2025.²

Commentors responding to the Further Notice overwhelmingly agree that scams and abusive robocalls are a significant problem that demands action by the Commission. Commentors also generally agree that providing subscribers with clear and accurate information about incoming calls helps them make informed decisions about which calls to answer and mitigates fraud. However, as many commentors point out, bad actors have been able to subvert existing procedures for caller ID attestation and present subscribers with deceptive information about incoming calls.³ This fact will undercut the Commission's proposal to require transmission of caller name information for all calls that receive an A-level attestation under the STIR/SHAKEN framework.

¹ FCC, Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-59; Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97; Further Notice of Proposed Rulemaking in CG Docket No. 02-278; Public Notice in CG Docket No. 25-307 (adopted October 28, 2025, released October 29, 2025) (Further Notice) <https://docs.fcc.gov/public/attachments/FCC-25-76A1.pdf>.

² <https://www.govinfo.gov/content/pkg/FR-2025-12-05/pdf/2025-22063.pdf>

³ See e.g., Comments of SecureLogix Corporation at pg. 1, <https://www.fcc.gov/ecfs/document/10105908611641/1> (“sophisticated bad actors have shown that it is possible to spoof STIR/SHAKEN and sign calls with Attestation A”); Comments of Transunion at pg. 9, <https://www.fcc.gov/ecfs/document/101050240302131/1> (“Data from September 2025 shows that 89.4 percent of calls originated by the ten providers considered the most prolific generators of robocalls by TransNexus were signed with A-level attestation. And YouMail recently found that 48 percent of unlawful calls carried A-level attestations.”).

In **Section I** of these Reply Comments, we urge the Commission to refrain from requiring the transmission of caller name information and instead focus on mandating that providers identify and block illegal calls at all points in the call path and prohibiting deceptive practices like “rental” of large quantities of telephone numbers to avoid properly identifying themselves.

Next, many commentors oppose the Commission’s proposal to prohibit foreign-originated calls from spoofing U.S. phone numbers because it can be difficult to determine a caller’s location and there are cost savings associated with offshore call centers that call U.S. consumers using spoofed U.S. phone numbers. In **Section II** of these Reply Comments, we urge the Commission to disregard these arguments. The prevalence of foreign-originated scam calls justifies a bright-line rule that will facilitate gateway providers blocking illegal calls at our borders. The Commission’s regulations regarding gateway providers already show that it is possible and useful to identify and restrict foreign-originated calls. Also, prohibiting foreign-originated calls from spoofing U.S. phone numbers will encourage companies to invest in domestic call center operations.

Lastly, in **Section III** we agree with commentors who argue that the Commission’s revocation rules should be amended to encourage callers to provide easy, automated mechanisms consumers can use to revoke consent and to limit the possibility that subscribers will inadvertently revoke consent for wanted calls such as fraud alerts. We provide and explain a proposed rule that will accomplish those goals.

I. The Commission should not mandate the presentation of caller name until it can be trusted.

We agree with the Commission and commentors that providing “clear and reliable caller identification information will help consumers make informed decisions about whether to answer incoming calls and mitigate attempts at frauds or scams.”⁴ However, inaccurate caller identification

⁴ New York State Department of Public Service, January 5, 2026.
<https://www.fcc.gov/ecfs/document/101053092314133/1>

information is worse than no caller identification information at all. Inaccurate caller identification information gives called parties a false sense of security, giving scammers an additional edge. Commentors point out that false attestation information, and even false branded caller ID information, is far from uncommon. For instance, USTelecom points to available data that shows “that many illegal calls, including scam calls, are signed and carry the highest level of attestation” and that “[b]ad actors exploit weaknesses in provider practices to obtain A-level attestation for unlawful calls, including spoofed calls, allowing those calls to appear indistinguishable from legitimate traffic based on STIR/SHAKEN attestation alone.”⁵ In other words, the STIR/SHAKEN framework has not and will not prevent criminals from using inaccurate caller ID information to deceive subscribers.

There is no reason to believe that regulations requiring presentation of caller names with A-level attested calls will not be subverted by bad actors and used to deceive consumers with more misleading or inaccurate information. Indeed, in its comments ZipDX presents evidence of recent calls made using branded caller ID frameworks where the caller name presented in the caller ID information did not match the caller name provided on the call, the same callers used different phone numbers for each call, and the callers did not honor requests to stop calling.⁶ This suggests that branded calling frameworks are not a barrier to tactics that are calculated to confuse, harass, and possibly defraud called parties.

Rather than expanding call labeling efforts by mandating the presentation of caller name, the Commission should instead focus on developing better customer screening, traffic screening, and call blocking requirements. The key to a safe telephone network is for providers to know who their

⁵ Comments of USTelecom – The Broadband Association at pg. 3.

<https://www.fcc.gov/ecfs/document/101052064208455/1>

⁶ Comments of ZipDX LLC at pgs. 3-5. <https://www.fcc.gov/ecfs/document/101060147309424/1>

customers are, to know what type of traffic their customers will send, and then to block non-conforming traffic that is likely to contain scams or other harmful communications. We urge the Commission to undertake a rulemaking on improving know-your-customer, know-your-traffic, and call blocking requirements at the earliest practicable time.⁷

II. Prohibiting spoofing of U.S. phone numbers by foreign callers will help prevent scam calling campaigns and boost domestic investment.

The Commission's proposal to prohibit foreign-originated calls that spoof U.S. phone numbers has drawn widespread criticism from a variety of commentators who articulate several concerns. First, some commentators point out that it is often difficult to identify whether a call is foreign-originated. For instance, where domestic voice service providers work in tandem with foreign providers to place calls which, if answered, are connected to foreign agents, it is unclear whether the call should be considered a foreign or a domestic call. Also, when a domestic originating provider is controlled by a foreign entity or a foreign provider uses domestic transmission equipment, the nature of the call is similarly ambiguous.⁸

We agree that nuances in calling processes make it difficult to know the location of the calling party or to know whether a nominally domestic provider is acting as a pass-through for a foreign entity. However, the term "foreign-originated" has an established meaning in the Commission's regulations, and although the term could be refined to address nuances like those raised by commentators to the Further Notice, the concept of foreign origination has been a useful

⁷ Our request echoes other commentators who have urged the Commission to undertake a rulemaking dedicated to additional actions to stop bad actors who seek to defraud consumers. Specifically, we support opening rulemaking proceedings on the issues raised by the American Bankers Association and related trade associations. Comments of the American Bankers Association, et al., at § VI, pgs. 29-33. <https://www.fcc.gov/ecfs/document/10106019480304/1>

⁸ Comments of ZipDX, LLC at pgs. 6-8. <https://www.fcc.gov/ecfs/document/101060147309424/1>

regulatory tool and is sufficiently definite to support the Commission’s proposal to prohibit using U.S. phone numbers for foreign-originated calls.

The definition of a foreign-originated call is functionally set forth in the definition of “gateway provider.”⁹ Gateway providers accept calls from foreign originating providers or foreign intermediate providers. Translating from the gateway provider definition, a foreign-originated call is one that comes from a foreign originating provider or possibly from either a foreign originating provider or a foreign intermediate provider. We believe it would be appropriate to define “foreign originated calls” as any call received from a “foreign originating provider or foreign intermediate provider” as those terms are used in 47 C.F.R. § 64.6300(d). Although it is possible that a domestic provider could originate a call that is passed to one or more foreign intermediate providers before being passed to a domestic intermediate or terminating provider, we believe that this arrangement is unlikely for most legitimate call traffic, and providers who need to transmit legal calls using U.S. phone numbers through foreign providers would be free to seek a waiver of variance from the Commission’s rules. Furthermore, treating calls received from foreign intermediate providers as presumptively foreign originated calls will incentivize callers with U.S. phone numbers to use domestic providers in the first instance, which will benefit domestic companies.

⁹ The definition of “gateway provider” and related definitions as set forth at 47 C.F.R. § 64.6300(d) state:

(d) The term “gateway provider” means a U.S.-based intermediate provider that receives a call directly from a foreign originating provider or foreign intermediate provider at its U.S.-based facilities before transmitting the call downstream to another U.S.-based provider. For purposes of this paragraph (d):

(1) U.S.-based means that the provider has facilities located in the United States, including a point of presence capable of processing the call; and

(2) Receives a call directly from a provider means the foreign provider directly upstream of the gateway provider in the call path sent the call to the gateway provider, with no providers in-between.

This definition is underinclusive to the extent that some domestically originated calls will feature foreign calling parties either because a foreign participant is connected after an otherwise domestic call is answered or because a nominally domestic provider is in fact operating as a foreign proxy. However, experience with the Commission's Robocall Mitigation Database (RMD) suggests that this definition is broadly suited to the Commission's consumer protection goals. Voice service providers self-certify as gateway providers in the RMD and implicit in that certification is a recognition that the provider can identify that it receives foreign-originated call traffic. Providers have not suggested that it is impossible for them to determine whether they are gateway providers for purposes of the RMD, and similarly providers can determine they are accepting traffic from a foreign originating provider and block calls from that provider if they purport to be from U.S. phone numbers.

Enacting this proposal will make it more difficult for the hardest-to-prosecute foreign criminals, those whose operations are wholly outside of the United States, to transmit scam calls with spoofed U.S. phone numbers. Prohibiting gateway providers from accepting calls that spoof U.S. phone numbers from foreign originating providers, with only limited exceptions for calls from U.S. subscribers roaming on foreign mobile networks, is a workable, bright-line rule that will require gateway providers to stop scam calls at our borders, even when U.S. enforcement authorities can't prosecute the overseas criminals responsible. While some gateway providers will likely collude with foreign criminals to profit from transmitting foreign originated scam calls to U.S. subscribers, this proposed rule will provide U.S. enforcement authorities with more tools to go after those corrupt gateway providers.

Next, some commentators suggest that prohibiting foreign calls that spoof U.S. phone numbers will increase some businesses' overhead expenses, undermine existing investments in foreign calling infrastructure, and confuse consumers who don't expect businesses to make

outbound phone calls from foreign telephone numbers.¹⁰ We agree with Chairman Carr that requiring foreign calls use foreign phone numbers promotes transparency and “[i]f this type of transparency encourages corporations to onshore more of their call center operations, then that would be added benefit too.”¹¹ We believe that cost savings from offshore outbound call centers do not meaningfully reduce the prices companies charge for their goods and services because prices are more likely dictated by macroeconomic factors. Marginal savings from operational cost cutting more likely contribute to shareholder dividends and ever escalating executive pay packages rather than materially decreasing consumer prices. Small businesses that are most sensitive to cost increases are unlikely to use offshore outbound call centers. Encouraging large companies to re-invest in domestic call center operations is a laudable consequence of the Commission’s proposal.

Additionally, the suggestion that consumers will miss important alerts if they come from foreign outbound call centers that can no longer spoof into U.S. phone numbers is misplaced. Consumers are already missing important alerts because many simply do not answer the phone for callers who are not on their contacts list. Prohibiting foreign originated calls from spoofing U.S. phone numbers will restore a measure of confidence that a U.S. phone number means a U.S. caller. That will help to restore consumers’ confidence in the integrity of the U.S. phone network, which will make consumers more likely to answer calls with important alerts – particularly if the caller invests in domestic calling operations to be able to legitimately display a U.S. phone number.

¹⁰ See e.g., Comments of MacMurray & Shuster, available at <https://www.fcc.gov/ecfs/document/10105139345685/1>

¹¹ Statement of Chairman Brendan Carr, Re: Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor; Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991; Dismissal of Outdated or Otherwise Moot Robocalls Petitions, Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-59; Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97; Further Notice of Proposed Rulemaking in CG Docket No. 02-278; and Public Notice in CG Docket No. 25-307 (October 28, 2025). <https://docs.fcc.gov/public/attachments/DOC-415139A2.pdf>

III. The Commission should amend its consent revocation rules to encourage easy, automated opt-out mechanisms that are clearly disclosed to the called party.

We support revising the Commission's consent revocation rules. The ability for consumers to revoke consent is an essential tool that allows consumers to exercise control over their phones. The Commission's rules should facilitate easy, automated mechanisms to revoke consent and mandate that if a consumer will continue to receive calls after revoking consent that fact is clearly conveyed along with an option to stop all calls for which consent is required.

First, we recommend that the Commission should set up a system that encourages callers to provide easy, automated methods for revoking consent. This could be done by allowing callers to designate certain methods as the exclusive means of revoking consent, so long as those methods are clearly and conspicuously disclosed to the called party as part of the call and are easy for called parties to use. Second, we agree with some callers that the Commission should allow callers to construe a consumer's revocation of consent as applying only to the type of call that prompted the revocation, so long as the caller clearly and conspicuously discloses this, and provides an easy, automated means for revoking consent for all types of calls which require consent.

The current consent revocation rule, set to go into effect on January 31, 2027,¹² prohibits callers from designating an exclusive means to request revocation of consent for calls which require consent.¹³ We agree with commentators who point out that prohibiting callers from designating an exclusive method for revoking consent can cause delays in processing revocation requests because callers must manually process revocation requests instead of relying on automated processes.¹⁴

¹² Order, In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, CG Docket No. 02-278. Adopted and Released January 6, 2026.

<https://docs.fcc.gov/public/attachments/DA-26-12A1.pdf>

¹³ 47 C.F.R. § 64.1200(a)(10) ("Callers or senders of text messages covered by paragraphs (a)(1) through (3) and (c)(2) of this section may not designate an exclusive means to request revocation of consent.")

¹⁴ Comments of the American Bankers Association, et al., at § I, pg. 14.

<https://www.fcc.gov/ecfs/document/10106019480304/1>

However, the exclusive method must be easy and automated. Automated procedures can benefit consumers by quickly processing revocation requests.

To accomplish these goals, we urge the Commission to modify its consent revocation rule, 47 C.F.R. § 64.1200(a)(10) to read as follows:

A called party may revoke prior express consent, including prior express written consent, to receive calls or text messages made pursuant to paragraphs (a)(1) through (3) and (c)(2) of this section by using any reasonable method to clearly express a desire not to receive further calls or text messages from a caller or sender, except that the caller may designate one of the following as the exclusive means to revoke consent if such means has been clearly and conspicuously disclosed to the called party as part of the call:

- (i) During a prerecorded voice call, by using an automated, interactive voice or key press-activated opt-out mechanism, including brief explanatory instructions on how to use such mechanism within two (2) seconds of providing the identification information required in paragraph (b)(1) of this section;
- (ii) In a text message call, by using one of the following words identified in the text message: “stop,” “quit,” or “end,” sent in reply to an incoming text message call; or
- (iii) When a message using an artificial or prerecorded voice is left on an answering machine or on a voice mail service, by making a revocation request through a website or telephone number designated by the caller.

All requests to revoke prior express consent or prior express written consent made following the procedures described in this section must be honored within a reasonable time not to exceed two business days from receipt of such request.

A key feature of this proposed rule is the requirement that the exclusive means of revoking consent must be disclosed to the called party “clearly and conspicuously.” The Commission’s rules state, in operative part, that “clear and conspicuous means a notice that would be apparent to the reasonable consumer, separate and distinguishable from the advertising copy or other disclosures.”¹⁵ We urge the Commission to clarify that a clear and conspicuous disclosure of the exclusive means to revoke consent should be delivered in the call itself. Disclosures which are buried in contract boilerplate and not otherwise provided in temporal proximity to a call which requires consent should not be considered clear and conspicuous. Also, when a message is delivered in a language other than

¹⁵ 47 C.F.R. § 64.1200(f)(3).

English, callers should disclose revocation options and honor revocations in the same language. Our proposed rule makes it clear that, if the exclusive method of revoking consent is not disclosed clearly and conspicuously during the call, a called party is free to revoke consent through any reasonable means.

Next, we agree that the Commission's rule, 47 C.F.R. § 64.1200(a)(12), the "revoke all rule," could cause some consumers to inadvertently revoke consent for wanted calls such as fraud alerts and two factor authentication calls. To avoid this possibility, we suggest that the Commission revise the rule as follows:

A caller may specify the scope of calls and text messages to which a revocation will apply as long as the caller informs the recipient of an option to revoke consent with respect to all calls requiring consent. A text message confirming a request to revoke consent or informing the called party of the option to revoke consent with respect to all calls and text messages requiring consent, sent within a reasonable time after receipt of a revocation request, does not violate paragraphs (a)(1) and (2) of this section as long as the confirmation text or texts do not include any marketing or promotional information. To the extent that the text recipient has consented to several categories of text messages from the text sender, the confirmation message may request clarification as to whether the revocation request was meant to encompass all such messages. If the called party does not respond to a confirmation text message, then the text initiator must construe the revocation as applying to all types of messages for which consent is required unless the text initiator has clearly and conspicuously disclosed that the revocation will not apply to all types of messages for which consent is required and provides an automated method to revoke consent for all types of messages.

Conclusion

We urge the Commission to take swift action to implement meaningful measures to protect consumers from scams and other harmful calls. Rebuilding trust in our telephone networks will help consumers and industry alike.

Respectfully submitted this 3rd day of February 2026, by:

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