Before the
Federal Communications Commission
Washington, D.C.

In the Matter of	)	
	)	
Improving the Effectiveness of the Robocall Mitigation Database	)	WC Docket No. 24-213
	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	

REPLY COMMENTS OF THE AMERICAN BANKERS ASSOCIATION, ACA INTERNATIONAL, AMERICAN FINANCIAL SERVICES ASSOCIATION, AMERICA'S CREDIT UNIONS, BANK POLICY INSTITUTE, CONSUMER BANKERS ASSOCIATION, DEFENSE CREDIT UNION COUNCIL, ELECTRONIC TRANSACTIONS ASSOCIATION, FINANCIAL TECHNOLOGY ASSOCIATION, MORTGAGE BANKERS ASSOCIATION, AND PAYMENTS LEADERSHIP COUNCIL TO THE FURTHER NOTICE OF PROPOSED RULEMAKING

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TABLE OF CONTENTS

INTRODUCTION AND SUMMARY……...4

ARGUMENT……...8

I. The Commission Should Prevent Voice Service Providers Removed from the Robocall Mitigation Database from Reentering the Database and Transmitting Illegal Calls…….…….8

II. The Commission Should Enhance its Review of RMD Filings Before those Filings Appear in the RMD……10

III. The Commission Should Expedite its Enforcement Actions Against Bad Actor Providers...……12

IV. The Commission Should Make Clear that a Company's In-House Private Branch Exchange or Call Center Is Not Required to File in the Robocall Mitigation Database……..……..….13

CONCLUSION……..13

APPENDIX……16

INTRODUCTION AND SUMMARY

The American Bankers Association (ABA), ACA International,[1] American Financial Services Association, America's Credit Unions, Bank Policy Institute (BPI), Consumer Bankers Association, Defense Credit Union Council, Electronic Transactions Association, Financial Technology Association, Mortgage Bankers Association, and Payments Leadership Council (collectively, the Associations)[2] appreciate the opportunity to comment on the Federal Communications Commission's proposal (Proposal) to strengthen the Robocall Mitigation Database.[3]

The Associations strongly support the Commission's continued efforts to use every available tool to protect consumers from illegally spoofed calls, including the current Proposal to strengthen the Robocall Mitigation Database. Fraudsters routinely use illegally spoofed calls to impersonate banks, credit unions, nondepository financial institutions, payment providers, government agencies, law enforcement, and other trusted organizations, causing substantial financial harm to consumers. A recent survey of banks indicates that these scams are on the rise.[4]

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[1] ACA International is also filing separate reply comments on the proposed definition of a voice service provider.

[2] A description of each Association is provided in the Appendix.

[3] *In the Matter of Improving the Effectiveness of the Robocall Mitigation Database*, *Call Authentication Trust Anchor*, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, WC Docket Nos. 24-213 & 17-97, CG Docket No. 17-59, Further Notice of Proposed Rulemaking, FCC 26-49 (July 23, 2026) [hereinafter, *Proposal*].

[4] *See* Tara Payne, Drew Ruben & Madison Stulga, Bank Policy Institute, *Hijacking Trust: How Scammers Exploit the Banking System's Most Valuable Asset* (July 20, 2026), https://bpi.com/wp-content/uploads/2026/07/Hijacking-Trust-How-Scammers-Exploit-the-Banking-Systems-Most-Valuable-Asset.pdf. The survey of 14 BPI member banks found that the average number of identified bank-impersonation scams originated by a phone call or text message increased 124 percent from 2024 to 2025. *Id.* at 2. Two surveyed banks reported that 40 percent of calls appearing to originate from bank-owned numbers had been spoofed. *Id.*

Illegally spoofed calls and texts can facilitate the theft of log-in credentials and takeover of a consumer's or business' account, and lead to fraudulent transfers and other substantial losses.[5]

We commend the Commission for its recent proposals to require all voice service providers in a call's pathway to take meaningful steps to prevent illegally spoofed calls from reaching consumers[6] and to propose a "Robocall Mitigation Scorecard" to rate voice service providers' effectiveness in combating illegal calls.[7] Recent polling shows that strong majorities of Americans support the Commission's proposals: 82% of consumers said they support regulatory action that requires providers that originate calls to do more to authenticate the

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[5] *See Protecting Seniors from AI Fraud: Hearing Before the S. Spec. Comm. on Aging*, 119th Cong. (2026) (testimony of Paul Benda, Exec. Vice Pres. for Risk, Fraud & Cybersecurity, Am. Bankers Ass'n) (describing specific harms to consumers that often result from illegally spoofed calls), https://www.aba.com/advocacy/policy-analysis/testimony-of-paul-benda-on-protecting-seniors-from-ai-fraud; *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket Nos. 17-59 & 02-278, Reply Comments of the Am. Bankers Ass'n to the Further Notice of Proposed Rulemaking (filed July 27, 2026), https://www.fcc.gov/ecfs/document/26110059138/1 (summarizing comments submitted by bankers that described how fraudsters spoof the telephone number of the bank's fraud department or customer service line, pose convincingly as trusted bank employees, and persuade customers to disclose sensitive account information that the fraudster uses to initiate funds transfers).

[6] *See In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket Nos. 17-59 & 02-278, FCC 26-27, Further Notice of Proposed Rulemaking (rel. May 1, 2026) (proposing to require originating providers to "know their customer"—i.e., to collect specific information about a prospective customer—before that customer may originate calls on the provider's network); *In the Matter of Call Authentication Trust Anchor*, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, WC Docket No. 17-97, CG Docket No. 17-59, FCC 26-32, Further Notice of Proposed Rulemaking (rel. May 21, 2026) (proposing to strengthen the "STIR/SHAKEN" call authentication framework and impose "know your upstream provider" requirements on "downstream" providers).

[7] Public Notice, *In the Matter of Empowering Consumers through Robocall Scorecard*, Consumer and Governmental Affairs Bureau Seeks Comment on Robocall Scorecard, CG Docket No. 26-239 (rel. Sept. 2, 2026).

identity of a caller to prevent illegally spoofed caller IDs.[8] Additionally, 81% of consumers support regulatory action that requires intermediate providers – i.e., providers that receive calls from "upstream" providers and transit the calls to a provider that is farther "downstream" – to do more to stop illegally spoofed calls that pass through their network, rather than delivering the illegal calls to recipients or to another provider.[9] We urge the Commission to finalize its proposals as soon as feasible.

The Robocall Mitigation Database (RMD or Database) plays an important role in the Commission's efforts to combat criminals who place illegally spoofed calls, and we support the Commission's proposal to improve its effectiveness. The Commission already requires all voice service providers to register in the RMD and submit information on their practices to prevent the transmission of illegal calls over their networks.[10] The public – including other voice service providers – have access to the information contained in the Database subject to confidentiality protections.[11] However, as the Commission acknowledged last year, certain providers "have not demonstrated the requisite level of diligence in ensuring that information submitted to the Database is accurate, complete, and up-to-date."[12] We appreciate that the Commission issued a

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[8] Press Release, Am. Bankers Ass'n, *National Survey: U.S. Consumers Trust Banks Most for Fraud Protection* (Oct. 26, 2026), https://www.aba.com/about-us/press-room/press-releases/oct-2026-morning-consult-survey-us-consumers-trust-banks-most-for-fraud-protection. The poll was conducted by Morning Consult on behalf of ABA from October 9-12, 2026, among a national sample of 4,402 adults split into two representative groups for specific question sets. Results from the full survey have a margin of error of plus or minus 1 percentage point.

[9] *Id.*

[10] *Proposal*, *supra* note 3, ¶ 2; *see also* Fed. Commc'ns Comm'n, Robocall Mitigation Database, https://www.fcc.gov/robocall-mitigation-database (last visited July 15, 2026).

[11] *See* Fed. Commc'ns Comm'n, Robocall Mitigation Database External Filing Instructions (July 2026) (explaining how a member of the public may view the contents in the Database).

[12] *In the Matter of Improving the Effectiveness of the Robocall Mitigation Database, Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, WC Docket No. 24-213 & MD Docket No. 10-234, Report and Order, FCC 24-85, ¶ 2 (2025).

final rule last year that required RMD filers to update information more promptly, established a $10,000 base forfeiture amount for submitting false or inaccurate information to the RMD, and directed the Commission's Wireline Competition Bureau (WCB) to establish a mechanism for reporting deficient RMD filings,[13] which WCB established this past January.[14] Moreover, the recent aggressive use of the RMD as an enforcement tool—including the removal of approximately 1,200 non-compliant voice service providers from the Database in August 2025[15]—has demonstrated immediate benefits by removing bad actors from our telecommunications network. However, the Commission must continue to accelerate these actions. In one recent case, an enforcement action against a gateway provider for foreign-originated illegally spoofed calls took 21 months from the reporting of the illegally spoofed calls to the Commission's initiation of the action. Expediting these proceedings and allocating additional resources to the Enforcement Bureau would substantially reduce consumer harm.

The Proposal builds on the Commission's recent actions by clarifying which entities must file reports in the RMD, requiring entities to file more specific information on their efforts to prevent the transmission of illegal calls, establishing a robust pre-screening process for RMD submissions, and limiting exemptions from filing requirements, among other steps.[16] We strongly

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[13] *Id.*, ¶¶ 13-18, 24-26.
[14] Public Notice, *Wireline Competition Bureau Announces OMB Approval and Effective Dates for Robocall Mitigation Database (RMD) Rules, Provides Guidance for Filing in the RMD, Reminds RMD Filers of Their March 1, 2026, Annual Recertification Requirement, and Establishes a Reporting Mechanism for RMD Deficiencies*, WC Docket No. 24-213 & MD Docket No. 10-234 (Jan. 22, 2026).
[15] *See In re Robocall Mitigation Database Filers*, Order, 40 FCC Rcd. 6009 (Enf. Bur. 2025) (removing 1,203 additional non-compliant voice service providers from the Robocall Mitigation Database).
[16] *Proposal*, *supra* note 3, ¶¶ 9-17, 25-58.

support the Proposal and urge the Commission to finalize it as soon as feasible. In addition, we offer the following recommendations to strengthen the Proposal further:

- The Commission should require each provider to state in its RMD filing the year in which it started providing voice service. This data point may help identify a provider that is the successor to an entity that was removed from the RMD for good cause.

- As the Commission finalizes its related rulemaking to strengthen requirements of intermediate providers (the "know your upstream provider" rulemaking), the Commission should require intermediate providers to consult the RMD when assessing whether a provider that is "upstream" is taking reasonable steps to prevent transmitting illegal calls, including whether it has been subject to a robocall-related enforcement action.

- The Commission should carefully review new RMD filings before accepting the filing in the RMD and enabling transmission of voice calls by the voice service provider that submitted the filing.

- The Commission should expedite its enforcement actions against bad actor providers, including by hiring additional Enforcement Bureau staff.

- The Commission should continue to make clear that a company's internal telephone system and call centers are not required to file in the RMD.

With these steps, the Commission will help ensure that every entity in the call path takes meaningful responsibility for keeping illegal calls off the U.S. calling network.

ARGUMENT

I. The Commission Should Prevent Voice Service Providers Removed from the Robocall Mitigation Database from Reentering the Database and Transmitting Illegal Calls

The Proposal seeks comment on measures to prevent bad actor providers—and the individuals and entities leading those providers—from reentering the RMD after the Commission removes them.[17] The Commission may remove a provider from the RMD for a deficient filing or for failing to implement effective measures to prevent callers from using the provider's network

[17] *Id.*, ¶¶ 98-107.

to originate or transit illegal calls.[18] The threat of removal from the RMD thus provides a strong incentive for providers to implement effective measures to prevent the origination or transmission of illegal calls. However, providers recently removed from the RMD are reentering under a new corporate entity. For example, a provider identified as facilitating a significant volume of bank impersonation calls was removed from the RMD in March 2026. Evidence subsequently provided to ABA by a consultant indicates that, by the following month, call traffic associated with the same activity had shifted to a newly named provider operating as an apparent successor.

We commend the Commission for seeking comment on how it can "prevent bad actor providers, and the individuals and entities behind them, from reentering the Database after removal."[19] We urge the Commission to review the name, address, phone number, and other identifying information of each individual named on an RMD filing to determine if that individual is part of a successor entity to a voice service provider that was removed from the RMD. If the information provided by the voice service provider raises concerns that it may be a successor to a provider removed from the Database, then the Commission should conduct additional diligence, including, as appropriate, requesting documentation about the provider's business and the individuals identified in its application. If the Commission determines that a removed provider has refiled under a new corporate name, the Commission should deny the successor entity's filing.

The Commission also should require intermediate and terminating providers to consult the RMD to determine whether directly upstream providers are taking reasonable measures to

[18] 47 C.F.R. §§ 64.6305(a)–(f).
[19] *Proposal*, *supra* note 3, ¶ 98.

prevent illegal calls, including whether that provider has been subject to a robocall-related enforcement proceeding or has previously been removed from the RMD. We applaud the Commission for proposing, in its "know your upstream provider" rulemaking, that intermediate providers collect and verify information about the originating or other "upstream" provider that sends calls to the intermediate provider.[20] We urge the Commission to require intermediate providers to use information contained in the RMD as part of this required diligence, so that intermediate providers understand more fully the risks associated with the calls that pass through their network.

The Commission also should require providers to state, in their RMD filing, the year in which they started providing voice service. The Commission should advise providers that an upstream provider's short operating history is a factor that warrants additional diligence or monitoring by the downstream provider when establishing or maintaining a business relationship with the upstream provider. Additional diligence or monitoring by the downstream provider is particularly needed when an (upstream) originating provider originates a high volume of calls purporting to originate from telephone numbers belonging to known banks, retailers, government agencies, or other trusted organizations.

II. The Commission Should Enhance its Review of RMD Filings Before those Filings Appear in the RMD

Under the Commission's current rules, once a voice service provider's RMD filing appears in the Database, other providers (i.e., intermediate and terminating providers) may

[20] *In the Matter of Call Authentication Trust Anchor*, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, WC Docket No. 17-97, CG Docket No. 17-59, Further Notice of Proposed Rulemaking, FCC 26-32, ¶¶ 15-31 (rel. May 21, 2026).

accept calls from that provider.[21] The Commission proposes to require its staff to review RMD filings before allowing the filing to appear in the RMD.[22] More specifically, the Commission proposes "to codify that the Bureau may reject, withhold publication of, or place into a pending status any new or updated filing that appears non-compliant, appears to have been submitted in evasion of the Commission's rules or orders, or otherwise requires further analysis before it can be accepted and published in the Database . . . ."[23]

We support the Commission's proposal to create a "pending" status. We suggest that all voice service providers that submit new filings initially be listed with a pending status. These listings will be public (as are all Database listings), which would allow the public to review which voice service providers are applying for access to the U.S. telecommunications network. We also agree with other commenters that the Commission should carefully review RMD filings to ensure the filing describes the steps the provider will take to prevent the transmission of illegally spoofed calls.[24] A filing that is incomplete or inadequate is a strong indication that the provider does not have proper safeguards in place to avoid transmitting illegally spoofed calls or, worse, that the provider is actively coordinating with callers who seek to place illegally spoofed calls.

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[21] 47 C.F.R. § 64.6305(g)(1) ("Intermediate providers and voice service providers shall accept calls directly from a domestic voice service provider only if that voice service provider's filing appears in the Robocall Mitigation Database . . . .").
[22] *Proposal*, *supra* note 3, ¶ 69 (proposing "to establish a new rule that a filing does not 'appear' in the Database unless and until the filing has been accepted and published in the Database").
[23] *Id.*
[24] *See, e.g., In the Matter of Improving the Effectiveness of the Robocall Mitigation Database*, *Call Authentication Trust Anchor*, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, WC Docket Nos. 24-213 & 17-97, CG Docket No. 17-59, Comments of NCTA – The Internet & Television 2 (filed Oct. 9, 2026), https://www.fcc.gov/ecfs/document/26110080370/1 (asserting that "enhanced scrutiny by the Commission before a provider is permitted to enter the RMD is likely the most consequential step the Commission could take right now in protecting consumers").

III. The Commission Should Expedite its Enforcement Actions Against Bad Actor Providers

We applaud the Commission for removing from the RMD voice service providers that, based on objective evidence, appear to exist primarily to facilitate unlawful calling campaigns or other fraudulent communications.[25] But in one recent Commission action – brought against a voice service provider that served as a gateway provider for a substantial number of foreign-originated illegally spoofed calls – the Commission initiated the enforcement action 21 months after the illegal calls were reported to the Commission. We commend the Commission for reducing the time required to identify and take action against these providers by proposing a "One-Step Removal Process."[26] Under this proposal, the Commission could remove a provider from the RMD without further process when the provider's conduct was "egregious" or when "further pre-removal process would be unnecessary, impracticable, or contrary to the public interest . . . ."[27] We support the Commission's proposal to make the One-Step Removal Process available for a single violation where the provider lacks candor, the provider has originated or transmitted calls impersonating another entity, or national security and law enforcement concerns warrant use of this process.[28] Impersonation of banks, credit unions, and other financial institutions causes substantial losses to consumers and often takes an extraordinary emotional toll.[29] Accelerating the identification and removal from the RMD of bad actors will reduce

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[25] *See supra* note 15 and accompanying text.
[26] *Proposal*, *supra* note 3, ¶ 85.
[27] *Id.*
[28] *Id.*
[29] *See supra* note 5 and accompanying text; Fed. Trade Comm'n, Protecting Older Consumers 2024-2025: A Report of the Federal Trade Commission 28 (Dec. 1, 2025), https://www.ftc.gov/system/files/ftc_gov/pdf/P144400-OlderAdultsReportDec2025.pdf (estimating that 2024 fraud and scam losses totaled $196 billion); Gallup & Stop Scams Alliance, *United States of Scams: The Financial and Emotional Fallout* 3, https://www.gallup.com/analytics/711827/scams-in-america.aspx (2026) (finding that, in 2025, 6% of U.S. adults – an estimated 15.1 million people – say they were scammed out of money).

consumer harm, strengthen confidence in the communications ecosystem, and better protect financial service providers and their customers from impersonation fraud. We also urge the Commission to allocate additional resources to its Enforcement Bureau to carry out this work.

IV. The Commission Should Make Clear that a Company's In-House Private Branch Exchange or Call Center Is Not Required to File in the Robocall Mitigation Database

The Commission proposes to expand the category of required RMD filers to include private branch exchanges (i.e., a company's internal telephone system, or "PBX") and call centers, among other types of entities, *to the extent that the entity "furnish[es] voice communications to an end user . . . .*" (emphasis added).[30] We note that this qualification means that a company's in-house call center does not qualify as a PBX or call center and would not be required to file in the RMD.[31] We also appreciate the Commission's additional statement that "end users are not required to file in the RMD . . . ."[32] We urge the Commission to continue to make clear that a company's in-house PBX or call center is not required to file in the RMD.

CONCLUSION

We strongly support the Proposal to strengthen the Robocall Mitigation Database and urge the Commission to finalize the Proposal as soon as feasible. As the Commission finalizes the Proposal, we urge it to require providers to state in its RMD filing the year in which it started

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[30] *Id.*, ¶ 14.

[31] An in-house call center does not furnish voice communications to an end user. Instead, a voice service provider provides voice communications to the financial institution or other caller, which is the end user.

[32] *Id.*, ¶ 46. As we noted in a comment submitted in a separate proceeding, the Commission does not have statutory authority to regulate the call centers of financial institutions. *See In the Matter of Improving Customer Service and Protecting Consumers through Onshoring*, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, and *Empowering Broadband Consumers Through Transparency*, CG Dockets No. 26-52, 17-59, 02-278, & 22-22, Comments of Am. Bankers Ass'n *et al.*, 8-15 (filed June 2, 2026), https://www.fcc.gov/ecfs/document/1060332993117/1.

providing voice service. Intermediate and terminating providers should consider an upstream provider's number of years in service when determining whether the upstream provider is transmitting illegal calls. In addition, the Commission should carefully review new RMD filings before accepting the filing in the RMD, expedite enforcement actions against bad actor providers, and continue to make clear that a company's internal telephone system and call centers are not required to file in the RMD.

We look forward to continuing to work with the Commission to protect Americans from fraud.

Respectfully submitted,

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APPENDIX

The American Bankers Association is the voice of the nation's $26.5 trillion banking industry, which is composed of small, regional and large banks that together employ over 2 million people, safeguard $20.7 trillion in deposits and extend $13.9 trillion in loans.

ACA International (ACA) represents approximately 1,400 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, in an industry that employs more than 113,00 people worldwide.

The American Financial Services Association (AFSA) is the national trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with closed-end and open-end credit products including traditional installment loans, mortgages, direct and indirect vehicle financing, payment cards, and retail sales finance.

America's Credit Unions is the national trade association for consumers' best option for financial services: credit unions. America's Credit Unions advocates for policies that allow credit unions to effectively meet the needs of their nearly 142 million members nationwide.

The Bank Policy Institute is a nonpartisan public policy, research and advocacy group that represents universal banks, regional banks, and the major foreign banks doing business in the United States. BPI produces academic research and analysis on regulatory and monetary policy topics, analyzes and comments on proposed regulations, and represents the financial services industry with respect to cybersecurity, fraud, and other information security issues.

The CBA is a member-driven trade association, and the only national financial trade group focused exclusively on retail banking—banking services geared toward consumers and small businesses. As the recognized voice on retail banking issues, CBA provides leadership, education, research, and federal representation for its members. CBA members operate in all 50

states. They include the nation's largest bank holding companies as well as regional and super-community banks. The overwhelming majority of CBA's members are financial institutions holding more than $10 billion in assets.

The Defense Credit Union Council (DCUC) is a national trade association and trusted resource for credit unions serving military and veteran communities. Since 1963, DCUC has championed the interests of America's credit unions through advocacy, education, collaboration, and engagement on legislative and regulatory matters that affect financial readiness, access, and support for servicemembers, veterans, and their families.

The Electronic Transactions Association (ETA) is the world's leading advocacy and trade association for the payments industry. Its members—from global incumbents to emerging fintech innovators—process approximately $56.75 trillion annually in purchases and person-to-person payments worldwide.

The Financial Technology Association (FTA) is a network of fintech leaders shaping the future of finance. We champion the power of technology-driven financial services to catalyze innovation and advocate for modernized policies and regulations that reflect this digital transformation.

The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry that works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans.

As a CEO-led organization, the Payments Leadership Council is committed to expanding global commerce and driving inclusive growth by encouraging public policies that protect consumers, foster inclusion, and promote innovation and competition in payments.