

**Before the  
Federal Communications Commission  
Washington, D.C.**

In the Matter of	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

**COMMENTS OF THE AMERICAN BANKERS ASSOCIATION, ACA  
INTERNATIONAL, AMERICAN FINANCIAL SERVICES ASSOCIATION,  
AMERICA’S CREDIT UNIONS, MORTGAGE BANKERS ASSOCIATION, AND  
STUDENT LOAN SERVICING ALLIANCE TO THE NOTICE OF PROPOSED  
RULEMAKING**

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The American Bankers Association, ACA International, American Financial Services Association, America’s Credit Unions, Mortgage Bankers Association, and Student Loan Servicing Alliance (the Associations)<sup>1</sup> appreciate the opportunity to comment on the Notice of Proposed Rulemaking (Proposal) in the above-captioned proceeding.<sup>2</sup> In the Proposal, the Federal Communications Commission (Commission) seeks comment on its conclusion that providers that use “non-IP” networks (Non-IP Providers) – i.e., providers of networks that do not rely on the Internet Protocol (IP) for communication – have effective caller ID authentication solutions available to implement on their networks and should implement one of those solutions, or upgrade their networks to IP. We agree with the Commission that Non-IP Providers have effective caller ID authentication solutions available and should implement one of those solutions. However, we urge the Commission to shorten the time required for Non-IP Providers to implement these solutions, from two years to one year, in light of the urgent need to stop criminals who are exploiting the absence of call authentication on non-IP networks to place fraudulent calls. We also urge the Commission to require Non-IP Providers to transition to IP by a date certain.

The Associations strongly support the Commission’s efforts to require caller ID authentication solutions on non-IP networks. Over the past two years, we have sounded the alarm regarding the increasing incidence of impersonation of legitimate companies, often accompanied by illegal “spoofing” of the number used in the caller ID – i.e., to cause a call recipient’s caller ID to display the name, or solely the number, of a legitimate company instead of the name and

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<sup>1</sup> A description of each Association is provided in the Appendix.

<sup>2</sup> *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Proposed Rulemaking, FCC 25-25 (rel. Apr. 29, 2025) [hereinafter, *Proposal*].

number of the actual caller, who typically seeks to defraud the recipient.<sup>3</sup> Illegally spoofed calls continue to harm consumers and undermine businesses' ability to communicate with their customers. According to Federal Trade Commission data, nearly 20% of fraud reports made in the first quarter of this year originated through a phone call to the victim.<sup>4</sup> Victims lost a median amount of \$1,800 – a higher amount than losses victims incurred through fraud committed over e-mail, text message, social media, or a website.<sup>5</sup>

The Commission, at the direction of Congress in the TRACED Act, has made progress to limit criminal access to our calling network by requiring voice service providers to implement the “STIR/SHAKEN” call authentication framework.<sup>6</sup> That framework requires calls to be signed at origination and attested through the call pathway until the call reaches the recipient. But STIR/SHAKEN only works over IP networks. It does not work over Time Division Multiplexing (TDM) or other non-IP networks. If a call passes through a non-IP network, the STIR/SHAKEN attestation is dropped.<sup>7</sup> Because STIR/SHAKEN cannot be implemented on non-IP networks, the TRACED Act directed the Commission to grant a delay in required

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<sup>3</sup> See, e.g., Letter from Am. Bankers Ass’n *et al.* to Marlene H. Dortch, Sec., Fed. Comm’n (Oct. 18, 2024), <https://www.fcc.gov/ecfs/document/1019107422584/1>; *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, Comments of Am. Bankers Ass’n *et al.*, CG Docket Nos. 17-59 & 17-97 (Sept. 16, 2022), <https://www.fcc.gov/ecfs/document/10917091207030/1>.

<sup>4</sup> Fed. Trade Comm’n, FTC Consumer Sentinel Network, All Fraud Reports by Contact Method, First Quarter 2025, <https://public.tableau.com/app/profile/federal.trade.commission/viz/FraudReports/FraudLosses> (last visited July 16, 2025).

<sup>5</sup> *Id.*

<sup>6</sup> See, e.g., *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, ¶ 15 (rel. Mar. 17, 2023) (expanding STIR/SHAKEN requirements to require non-gateway intermediate providers to authenticate SIP calls that are not authenticated by originating providers).

<sup>7</sup> See *Proposal*, *supra* note 2, ¶ 9. As the Commission observed, “as many as 57.2% of calls that may be signed by the originating provider reach their destination unsigned.” *Id.*, ¶ 3 n.12 (citing data from TransNexus).

compliance for non-IP networks “until a call authentication protocol has been developed for calls delivered over non-[IP] networks and is reasonably available.”<sup>8</sup>

In 2022, the Commission sought comment on how it could eliminate this “gap” in our nation’s caller ID authentication scheme.<sup>9</sup> At the time, voice service providers asserted that investments in IP networks would lead to a reduction in TDM networks, enabling STIR/SHAKEN call authentication to be present throughout the path of calls.<sup>10</sup> But today, nearly three years later, calls still traverse non-IP networks, allowing criminals to place unsigned calls. To combat criminals’ exploitation of non-IP networks and bolster the efficacy of STIR/SHAKEN, we urge the Commission to take two steps:

First, the Commission should require Non-IP Providers to transition to IP by a date certain. The Commission has recognized that upgrading TDM networks to IP is the most effective solution.<sup>11</sup> Only IP networks maintain the “header” information for a call, which identifies the service provider that originated the call.<sup>12</sup> STIR/SHAKEN adds to this information an attestation regarding the caller’s right to use the phone number that will appear in the recipient’s Caller ID and a unique numerical tag that allows an entity to easily identify the

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<sup>8</sup> 47 U.S.C. § 227b(b)(5)(B).

<sup>9</sup> *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Inquiry, FCC 22-81, ¶ 1 (rel. Oct. 28, 2022).

<sup>10</sup> *See, e.g., id.*, Comments of USTelecom – The Broadband Association 10 (filed Dec. 12, 2022), <https://www.fcc.gov/ecfs/document/121281764725/1> (“An unprecedented wave of privately funded and government-backed broadband deployment will also serve to organically reduce TDM technologies in the near future, therefore enabling STIR/SHAKEN throughout the call path.”).

<sup>11</sup> *Proposal, supra* note 2, ¶ 4 (“A complete IP transition remains the best solution to achieving ubiquitous caller ID authentication, as it will enable providers to implement STIR/SHAKEN without additional regulatory requirements.”).

<sup>12</sup> *See, e.g.,* JumpCloud, *Understanding the Structure and Functionality of the IP Header*, <https://jumpcloud.com/it-index/understanding-the-structure-and-functionality-of-the-ip-header> (last visited July 16, 2025).

originating provider of the call. This information is critical for legitimate companies to combat illegal spoofing. If a company learns that a criminal is illegally spoofing its outbound calling number and brand, the company, or its service provider, can review the header information for those illegal calls to learn which provider originated the calls. The company can then advise all other service providers not to transit calls that appear to have been placed by that provider. However, if the illegally spoofed calls transit a non-IP network, the call's header information, including the STIR/SHAKEN information, is dropped, and there is no way to readily determine the provider that originated the illegal calls. Moreover, IP networks facilitate the deployment of additional consumer protections such as branded calling, which displays the name and/or logo of the caller and reason for the call.

Second, during the interim period before all Non-IP Providers transition to IP, the Commission should require voice service providers to implement caller ID authentication solutions on non-IP networks.<sup>13</sup> We agree with the Commission that Non-IP Providers have effective caller ID authentication solutions reasonably available, as other commenters have noted.<sup>14</sup> However, the Commission should not deem effective any solution that does not enable

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<sup>13</sup> Since 2022, the Associations have urged the Commission to require voice service providers to implement caller ID authentication solutions on non-IP networks. *See In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Comments of Am. Bankers Ass'n *et al.* (filed Dec. 12, 2022), <https://www.fcc.gov/ecfs/document/12132684621465/1>; *id.*, Reply Comments of Am. Bankers Ass'n *et al.* (filed Jan. 23, 2023), <https://www.fcc.gov/ecfs/document/1012371710473/1>.

<sup>14</sup> *See, e.g., In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59 & WC Docket No. 17-97, Reply Comments of TransNexus, 7 (filed Sept. 16, 2022), <https://www.fcc.gov/ecfs/document/10916337622768/1> (describing commercially available solutions); *see also id.*, Reply Comments of the Cloud Communications Alliance, 3-4 (filed Sept. 16, 2022), <https://www.fcc.gov/ecfs/document/109161816206515/1>.

the transmission of all STIR/SHAKEN information, in particular the identification of the original signing provider.

We urge the Commission to require Non-IP Providers to implement a caller ID authentication solution within one year, not two years as proposed. As the Commission observed, it “previously adopted compliance timelines of roughly 15 months for voice service providers, 13 months for gateway providers, and 10 months for certain non-gateway intermediate providers to implement STIR/SHAKEN in their IP networks, and providers were generally able to meet those deadlines.”<sup>15</sup> Non-IP Providers have been on notice since the Commission’s 2022 Notice of Inquiry that the Commission may require Non-IP Providers to implement a caller ID authentication requirement. Non-IP Providers should not receive more time than other providers received to implement a caller ID authentication framework. Criminals are placing an increasing number of fraudulent calls.<sup>16</sup> Each day that calls transit our nation’s telecommunications systems without authentication represents an opportunity for criminals to defraud consumers and small businesses.

For these reasons, we urge the Commission to require Non-IP Providers to transition to IP by a date certain and to require voice service providers within one year to implement caller ID authentication solutions on non-IP networks.

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<sup>15</sup> *Proposal, supra* note 2, ¶ 49 (internal citations omitted).

<sup>16</sup> For example, through May, criminals had placed 23.8 billion suspected illegal automated calls this year, according to YouMail – an average of 72 suspected illegal calls per consumer. These figures represent an 11% increase over the number of suspected illegal automated calls placed during the same time period in 2024. *YouMail, Robocall Index*, <https://robocallindex.com/history/time> (last visited June 12, 2025).

Respectfully submitted,

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July 16, 2025

## **APPENDIX**

The American Bankers Association is the voice of the nation's \$24.5 trillion banking industry, which is composed of small, regional and large banks that together employ approximately 2.1 million people, safeguard \$19.5 trillion in deposits and extend \$12.8 trillion in loans.

ACA International represents approximately 1,600 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. Most ACA member debt collection companies are small businesses. The debt collection workforce is ethnically diverse, and 70% of employees are women. ACA members play a critical role in protecting both consumers and lenders. ACA members work with consumers to resolve their past debts, which in turn saves every American household more than \$700 year after year. The ARM industry is instrumental in keeping America's credit-based economy functioning with access to credit at the lowest possible cost.

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 140 million members nationwide.

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.

The Student Loan Servicing Alliance (SLSA) is the nonprofit trade association that focuses exclusively on student loan servicing issues. Our membership is responsible for servicing over 95% of all federal student loans and the vast majority of private loans, and our membership is a mix of companies, state agencies, non-profits and their service partners. Our servicer members and affiliate members provide the full range of student loan servicing operations, repayment support, customer service, payment processing, and claims processing for tens of millions of federal and private loan borrowers across the country.