

May 13, 2026

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: *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-CIRC 2605-01 (rel. Apr. 29, 2026)

Dear Chairman Carr,

The American Bankers Association¹ (ABA) commends you and the Federal Communications Commission (Commission) for scheduling a vote on May 20 to issue a proposal to impose stronger “know your upstream provider” (KYUP) requirements on voice service providers that allow calls to pass through their network (Proposal).² The Proposal also would require originating providers to take certain actions to ensure they do not originate illegally spoofed calls.

We appreciate your continued leadership to prevent criminals from impersonating banks and other legitimate businesses in calls placed to consumers. Last month, with ABA’s support,³ the Commission voted to issue a separate proposal that would impose stronger “know your customer” requirements on voice service providers that originate calls.⁴ The Proposal the Commission will consider on May 20 is an important complement to that action. It would require all voice service providers in the call’s pathway to collect certain information about the caller from the “upstream” provider—e.g., the provider that originated the call—to better ensure each provider is transmitting only lawful calls.

Significantly, the Proposal also seeks to strengthen the requirements for “A-level” or “B-level” attestations. Under the “STIR-SHAKEN” call authentication framework, calls are “signed” at origination with different levels of “attestation.” A call that receives an “A-level” attestation – the highest form of attestation – means the originating provider knows the caller and knows the

¹ The American Bankers Association is the voice of the nation’s \$25.1 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$19.7 trillion in deposits and extend \$13.2 trillion in loans.

² *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-CIRC 2605-01 (rel. Apr. 29, 2026) [hereinafter, *Proposal*].

³ See Letter from Jonathan Thessin, Am. Bankers Ass’n, to Brendan Carr, Chairman, Fed. Commc’ns Comm’n (Apr. 23, 2026), <https://www.fcc.gov/ecfs/document/104231850808890/1>.

⁴ *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, Further Notice of Proposed Rulemaking (May 1, 2026).

caller has the legal right to the number that will be displayed in the recipient's caller ID.⁵ If a call receives A-level attestation, it is eligible for vendors' call branding designed to signal that the call is from a legitimate source, such as a green "checkmark." In a prior comment, ABA provided an analysis, cited by the Commission in the Proposal,⁶ that found that, in a sample of 12,900 illegally spoofed calls, more than half of the calls received an A-level or B-level attestation.⁷ In that comment, we called on the Commission to require originating providers to verify that the caller has the legal right to use the number that will be displayed in the recipient's caller ID display when the caller seeks to place an A-level attested call.⁸ We share the Commission's belief that not "all originating providers are meaningfully verifying a customer's association with a telephone number, leading to improper attestations."⁹ We commend the Commission for proposing specific ways that an originating provider can verify that its customer (the caller) has the legal right to the telephone number used for a call.¹⁰

We look forward to the Commission's consideration of the Proposal at its May 20 meeting and to seeing it finalized.

Sincerely,



Jonathan Thessin
Vice President/Senior Counsel
Consumer & Regulatory Compliance
Regulatory Compliance and Policy

⁵ See *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Eighth Report and Order ¶ 10 (2024), <https://docs.fcc.gov/public/attachments/FCC-24-120A1.pdf> (describing attestation levels). B-level attestation means that the originating provider knows the caller but does not know if the customer has lawful access to the number used to place the call. C-level attestation means the originating provider does not know the caller or whether the caller has lawful access to the number. *Id.*

⁶ *Proposal*, *supra* note 2, ¶ 55.

⁷ *In the Matter of 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*, Comments of Am. Bankers Ass'n *et al.*, CG Docket Nos. 17-59, 02-278, & 25-307, WC Docket No. 17-97, App. C, at 3-5 (filed Jan. 5, 2026), <https://www.fcc.gov/ecfs/document/10106019480304/1>. For ABA, a consultant identified 12,900 calls placed between January 1, 2025 and December 18, 2025, that illegally spoofed 47 financial institutions and other leading U.S. companies. Of those calls, 80.2% received A- or B-level attestation.

⁸ *Id.* at 22.

⁹ *Proposal*, *supra* note 2, ¶ 63.

¹⁰ *Id.*, ¶ 64.