

March 19, 2026

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

Re: *In the Matter of Combatting Illegal Robocalls Through FCC Numbering Policies, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources, Numbering Policies for Modern Communications, Telephone Number Requirements for IP-Enabled Service Providers*, WC Docket Nos. 26-49, 20-67, 13-97, & 07-243, Notice of Proposed Rulemaking, FCC-CIRC 2603-02 (rel. Mar. 5, 2026)

Dear Chairman Carr,

The American Bankers Association (ABA)¹ commends the Federal Communications Commission (Commission) for scheduling a vote to issue a proposal (Proposal) that would strengthen the Commission’s numbering policies to combat illegal calls.² Among other steps, the Commission proposes to impose restrictions on the resale of phone numbers and to seek comment on how the Commission should address number “cycling” – i.e., the use by a caller of large quantities of telephone numbers on a rotating or single-use basis to avoid detection.

Fraud continues to be a pervasive problem that takes an extraordinary financial and emotional toll on consumers. In a December 2025 report, the Federal Trade Commission estimated that 2024 fraud losses totaled a staggering \$196 billion.³ Increasingly, criminals perpetrate fraud by impersonating banks and other legitimate companies through voice calls, text messages, and advertisements on social media websites. Criminals illegally “spoof” the number used in the caller ID, causing a call recipient’s caller ID to display the name, or solely the number, of a legitimate company instead of the name and number of the actual caller with the intent to defraud the consumer. The numbering practices addressed by the Proposal should limit the ability of criminals to complete calls to consumers without detection, gain consumers’ trust, and perpetrate fraud.

The Proposal builds on the Commission’s recent action to mandate U.S. voice service providers and intermediate providers block calls from Belthrough LLC for violating the Commission’s

¹ The American Bankers Association is the voice of the nation’s \$25.3 trillion banking industry, which is composed of small, regional and large banks that together employ over 2 million people, safeguard \$20.1 trillion in deposits and extend \$13.5 trillion in loans.

² *In the Matter of Combatting Illegal Robocalls Through FCC Numbering Policies, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources, Numbering Policies for Modern Communications, Telephone Number Requirements for IP-Enabled Service Providers*, WC Docket Nos. 26-49, 20-67, 13-97, & 07-243, Notice of Proposed Rulemaking, FCC-CIRC 2603-02 (rel. Mar. 5, 2026).

³ 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.

rules against illegal calls, and to remove the company from the Robocall Mitigation Database.⁴ We applaud the Commission for effectively shutting down Belthrough as one step in our larger collective fight against illegal calls.

In comments we submitted recently, ABA offered data demonstrating that rogue originating voice service providers like Belthrough are able to establish themselves and, within weeks, originate hundreds of millions of illegal calls.⁵ Moreover, in a poll of 4,456 adults conducted by Morning Consult for ABA this past February, 77% of consumers said they support regulatory action that requires telecommunications providers to do more to authenticate the identity of a caller and prevent spoofed caller IDs.⁶ We look forward to continuing to work with the Commission to combat illegal calls and text messages.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Thessin". The signature is written in a cursive, flowing style.

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

⁴ *In the Matter of Belthrough LLC*, EB-TCD-24-00037445, EB Docket No. 22-174, Final Determination Order and Removal Order (rel. Mar. 12, 2026).

⁵ *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*, CG Docket Nos. 17-59, 02-278, & 25-307, WC Docket No. 17-97, Comments of Am. Bankers Ass'n *et al.* 23 (filed Jan. 5, 2026), <https://www.fcc.gov/ecfs/document/10106019480304/1>.

⁶ Press Release, Am. Bankers Ass'n, *National Survey: U.S. Consumers Rank Banks Above Other Industries for Fraud Protection* (Mar. 11, 2026), <https://www.aba.com/about-us/press-room/press-releases/morning-consult-survey-spring-2026-fraud>.