

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

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

**COMMENTS OF ACA INTERNATIONAL, AMERICA’S CREDIT UNIONS,
AMERICAN BANKERS ASSOCIATION, AMERICAN FINANCIAL SERVICES
ASSOCIATION, BANK POLICY INSTITUTE, DEFENSE CREDIT UNION COUNCIL,
INDEPENDENT COMMUNITY BANKERS OF AMERICA, MORTGAGE BANKERS
ASSOCIATION, NATIONAL COUNCIL OF HIGHER EDUCATION RESOURCES,
STUDENT LOAN SERVICING ALLIANCE, AND NATIONAL CONSUMER LAW
CENTER REGARDING THE EFFICACY OF STIR/SHAKEN CALLER ID
AUTHENTICATION**

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EXECUTIVE SUMMARY

ACA International, America's Credit Unions, American Bankers Association, American Financial Services Association, Bank Policy Institute, Defense Credit Union Council, Independent Community Bankers of America, Mortgage Bankers Association, National Council of Higher Education Resources, Student Loan Servicing Alliance, and National Consumer Law Center on behalf of its low-income clients ("Associations") acknowledge the importance of a trustworthy phone system and the Federal Communications Commission's (Commission) efforts to combat illegal robocalls, but unfortunately STIR/SHAKEN has not significantly reduced fraudulent calls. Despite years of implementation, spoofed calls remain a major driver of consumer fraud, with losses exceeding \$12.5 billion in 2024 and robocall volumes reaching nearly 5 billion in April 2025. The Associations believe that the current evaluation standard, which is focused on technical authentication, should also measure actual reductions in illegal robocalls, where progress has been minimal.

We recommend several improvements to strengthen STIR/SHAKEN. First, the Commission should set a firm deadline for transitioning all providers from legacy TDM

networks to IP-based networks, as STIR/SHAKEN only works over IP. Second, enforcement against improper attestations must be enhanced, including penalties and stricter entry requirements for the Robocall Mitigation Database (RMD). Third, clearer guidance on Know-Your-Customer (KYC) standards is needed to ensure providers exercise due diligence before allowing traffic on their networks. These steps are critical to restoring trust and achieving the TRACED Act's goals.

Beyond number authentication, the Associations urge expanding efforts to authenticate caller identity through branded calling and Rich Call Data (RCD), which display verified names, logos, and call purposes on recipients' devices. However, RCD also requires universal IP connectivity and standardized, affordable implementation. We also ask the Commission to eliminate exemptions that allow providers to avoid compliance, such as those related to SPC token access and non-IP networks, and for strengthening the Secure Telephone Identity-Governance Authority (STI-GA) by increasing transparency, preventing token misuse, and adding board seats for enterprise callers and consumer protection organizations.

Without these reforms outlined above and further detailed below, the STIR/SHAKEN framework will remain inadequate to curb illegal robocalls and protect consumers.

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INTRODUCTION

Fraudulent calls, such as calls purporting to come from a consumer’s financial institution, continue to plague consumers. Bad actors seek to impersonate legitimate companies often 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 number of the actual caller, who typically seeks to defraud the recipient.⁵ The Federal Trade Commission (FTC) reports that consumers lost \$12.5 billion to fraud in 2024, a 25% increase from 2023, with impostor scams alone accounting for nearly \$3 billion.⁶ The FBI similarly reports \$16.6 billion in scam and cybercrime losses last year. Spoofed calls remain a major driver of these losses.⁷ A recent, comprehensive report by the Aspen Institute Financial Security Program states that 1 in 5 consumers have been the victim of fraud, yet very few report losses to law enforcement or federal agencies.⁸ Accounting for underreporting, the FTC estimates that losses to scams exceed \$158 billion a year.⁹ Overall, the magnitude of scam robocalls remains unacceptably high, underscoring that more work needs to be done.

⁵ See, e.g., Letter from Am. Bankers Ass’n *et al.* to Marlene H. Dortch, Sec., Fed. Commc’ns 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>.

⁶ Press Release, Fed. Trade Comm’n, New FTC Data Show a Big Jump in Reported Losses to Fraud to \$12.5 Billion in 2024 (March 10, 2025), <https://www.ftc.gov/news-events/news/press-releases/2025/03/new-ftc-data-show-big-jump-reported-losses-fraud-125-billion-2024>.

⁷ U.S. Dep’t of Justice, Fed. Bureau of Investigation, Internet Crime Report, (2024), https://www.ic3.gov/AnnualReport/Reports/2024_IC3Report.pdf.

⁸ Aspen Institute, *United We Stand: A National Strategy to Prevent Scams* (2025), https://static1.squarespace.com/static/671a80aa4a84f2359ce4d360/t/68db3571c0b781588f988d15/1759196529115/National+Strategy+to+Prevent+Scams_9-29.pdf (noting that only 1 in 17 victims report scams to federal agencies.)

⁹ *Id.* at 7.

The Associations recognize the value of having a trustworthy phone system for our member institutions and their customers, and we appreciate the Commission's efforts to curb illegal calls, including through the implementation of the STIR/SHAKEN call authentication framework.¹⁰ We believe, however, that more needs to be done to improve the efficacy of STIR/SHAKEN. In particular, the Commission should require providers utilizing legacy TDM networks to transition to IP by a date certain, ensure that telephone companies are not misapplying STIR/SHAKEN standards, and clarify know-your-customer requirements. We also recommend eliminating the exemptions for providers unable to obtain a Service Provider Code (SPC) token. In addition, to make the STIR-SHAKEN framework meaningful, it is essential that the Commission strengthen the Secure Telephone Identity-Governance Authority (STI-GA) – the governing authority that sets policy for use of the STIR-SHAKEN framework. We recommend that the Commission do this by requiring greater transparency in the STI-GA's review of providers identified as improperly signing calls, preventing the issuance of tokens and certificates to providers associated with entities whose tokens have been revoked, and encouraging STI-GA to take stronger enforcement actions against providers who brazenly flout requirements. We also urge the Commission to establish dedicated seats on the STI-GA's board of directors for a business that places calls to its customers and for a non-profit organization with a consumer protection mission.

¹⁰ Under STIR/SHAKEN, the caller ID information of outbound calls is authenticated at origination and then verified through the call's pathway so that the recipient can have confidence that the number displayed in the recipient's caller ID is the number for the entity placing the call. *See generally* Fed. Commc'ns Comm'n, Combating Spoofed Robocalls with Caller ID Authentication, <https://www.fcc.gov/call-authentication> (last visited Sept. 30, 2025).

I. STANDARD FOR EVALUATING EFFICACY

As noted, the TRACED Act directs the Commission, every three years, to report to Congress on the efficacy of STIR/SHAKEN and to make recommendations to revise or replace the standard as the public interest may require. In its initial triennial report in 2022, the Commission assessed STIR/SHAKEN's efficacy based on its ability to authenticate the telephone number that appears in the called party's caller ID field.¹¹ The key functionality of STIR/SHAKEN is to securely transmit what the originating carrier knows about the caller's right to use a particular telephone number in caller ID to the terminating carrier – i.e., to inform whether the terminating carrier blocks the call or labels the call as “likely fraud” or “likely spam.” But STIR/SHAKEN is not yet living up to this promise. Even after years of implementation, the majority of calls signed by the originating provider arrive at the terminating provider with the STIR/SHAKEN information stripped out, largely due to TDM-based equipment in the call chain.¹² As the Associations have previously noted, the presence of legacy TDM network elements in the call path prevents transmission of STIR/SHAKEN information, dramatically reducing the effectiveness of the framework as a tool to mitigate fraud and other forms of illegal traffic.¹³ We urge the Commission to prohibit the practice of routing calls through TDM networks for the purpose of stripping out STIR/SHAKEN information.

The First Triennial Report declined to assess STIR/SHAKEN's efficacy based on its effectiveness in reducing fraudulent or illegal calls. The Commission should reconsider this

¹¹ Triennial Report on the Efficacy of the Technologies Used in the STIR/SHAKEN Caller ID Authentication Framework, WC Docket No. 17-97 (Dec. 30, 2022) (First Triennial Report).

¹² TransNexus STIR/SHAKEN statistics from August 2025 (finding that in August 2025, “only 38.4% of calls arrive at termination with call authentication information intact.”), <https://transnexus.com/blog/2025/shaken-statistics-august>.

¹³ *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Comments of the American Bankers Association, et al. (filed July 16, 2025).

decision. Instead of focusing solely on the ability of providers to perform the technological act of attesting to the authenticity of phone numbers, the Commission should also assess the effectiveness of the framework in reducing the amount of illegal robocalls. Congress originally mandated STIR/SHAKEN under the TRACED Act as a critical tool in curbing illegal robocall traffic, particularly spoofed calls used for fraud and deception.

Unfortunately, by this more meaningful standard, STIR/SHAKEN has not delivered appreciable improvements. Robocall volumes remain high, with recent data showing a resurgence in 2025 after a brief decline in 2024.¹⁴ April 2025 saw the highest robocall volume since 2019, with nearly 5 billion robocalls in a single month.¹⁵ As another indicator, the level of robocalls is virtually unchanged since the First Triennial Report concluded that STIR/SHAKEN was effective. In the month of that report's release, December 2022, YouMail reported 4.3 billion robocalls. But in August 2025, YouMail reported consumers received 4.2 billion robocalls. Moreover, the percentage of the robocalls YouMail identified as scams increased from 25% in December 2022 to 28% in August 2025.¹⁶

These trends raise concerns regarding the effectiveness of STIR/SHAKEN as currently implemented and indicate revisions are required. Below, we discuss steps that the Commission can take to improve the efficacy of STIR/SHAKEN. These steps include addressing the continued prevalence of TDM infrastructure and the lack of universal IP interconnection; the failure of some in the industry to exercise stringent due diligence before a call is placed on the network; and fostering a uniform, standardized call authentication framework as an extension of STIR/SHAKEN.

¹⁴ YouMail, *August 2025 Nationwide Robocall Data* (August 2025), <https://robocallindex.com>.

¹⁵ Press Release, *YouMail, April 2025 Spam Call Report: U.S. Robocall Surge Hits 5 Billion* (May 3, 2025), <https://blog.youmail.com/2025/05/april-2025-spam-call-report-u-s-robocall-surge-hits-5-billion/>.

¹⁶ YouMail, *Historical Robocalls by Time* (August 2025), <https://robocallindex.com/history/time>.

II. RECOMMENDED IMPROVEMENTS

Several improvements to the STIR/SHAKEN framework and its implementation are urgently needed to meaningfully reduce illegal robocalls.

A. Establish a Firm Deadline for the Transition to IP-Based Networks.

The STIR/SHAKEN framework – which requires calls to be signed at origination and attested through the call pathway until the call reaches the recipient – only works over IP networks. If a call passes through a non-IP network, which is often the case, the STIR/SHAKEN attestation is dropped.¹⁷ The most effective way to ensure that STIR/SHAKEN information is received by the terminating carrier and can be utilized to help determine how to treat the call – whether to block or label as spam or pass through – is to remove non-IP networks in the call path and transition to IP networks. The Associations have previously called for this solution.¹⁸ As noted in the Associations’ comments in the non-IP network proceeding, the Commission should establish a date certain by which providers must transition to IP. Any exceptions to this deadline should be temporary and only granted in compelling circumstances, such as where the applicant can demonstrate that compliance will endanger rural call completion.

B. Prohibit Unnecessary Routing of IP Calls through TDM Networks.

Many scam calls are deliberately routed through TDM interconnections for the purpose of stripping out STIR/SHAKEN information to reduce the chances that the calls will be blocked. We urge the Commission to identify this activity as a mechanism designed to evade Commission

¹⁷ See *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Proposed Rulemaking, FCC 25-25, para. 9 (rel. Apr. 29, 2025). As the Commission observed, “as many as 57.2% of calls that may be signed by the originating provider reach their destination unsigned.” *Id.*, para. 3 n.12 (citing data from TransNexus).

¹⁸ *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Comments of the American Bankers Association, et al. (filed July 16, 2025).

regulations, and to prohibit this behavior for the remaining time during which TDM networks are still in operation.

C. Improve Enforcement Against Improper Attestations.

Under the STIR/SHAKEN framework, telephone companies assign different levels of attestation to calls depending on their confidence that the caller is entitled to use the number in the caller ID field. An A-level attestation means the phone company knows the caller and knows it has the right to use the number, usually because the caller is the phone company's customer and the phone company assigned the number to that caller. A B-level attestation means the phone company knows the caller but does not know whether it is entitled to use the number, for example because another phone company assigned the number. Finally, a C-level attestation means the phone company transmitting the call cannot verify the caller or the number. The assignment of proper attestation level requires an honest assessment by the telephone company making the attestation.

The Commission's Eighth Report and Order clarified that originating service providers have full responsibility for the calls they sign, even if third parties perform the technical signing.¹⁹ This change sought to close loopholes that allowed providers to issue A-level attestations for calls originating from customers with no verified right to use the numbers. But improper attestations continue to erode trust in the STIR/SHAKEN framework and enable bad actors to exploit the system. We appreciate that the Commission has established enforcement mechanisms, including penalties and delisting from the Robocall Mitigation Database

¹⁹ *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Eighth Report and Order, 39 FCC Rcd 12894 (2024).

(“RMD”)²⁰, to deter improper attestations and to help ensure that attestation levels reflect genuine telephone number validation. The Commission can and should do more to strengthen the STIR/SHAKEN framework. As one step, the Commission should impose stricter entry requirements for companies to be listed on the RMD. The Commission also should bar individuals who were listed as, or were in fact, the “responsible party” (i.e., the legal owner, beneficial owner, or chief executive) of voice service providers whose actions resulted in removal from the RMD from re-joining the RMD under the name of a new provider.

D. Provide Further Guidance on Know-Your-Customer Standards.

The Commission must provide clearer guidance on what Know Your Customer (“KYC”) standards apply to voice service providers and ensure those standards prevent bad actors from placing authenticated calls. While KYC is now a general expectation for voice service providers, there remains ambiguity around what constitutes sufficient due diligence.²¹ The failure to clarify know-your-customer standards has led some companies to be unsure of their obligations. Exercising reasonable due diligence into the nature of a business whose calls a telephone company is allowing on the network is a critical step in curbing illegal calls.

We appreciate that the Commission has proposed in its Ninth Further Notice of Proposed Rulemaking that terminating providers must transmit verified caller identity information whenever they transmit an A-level attested call. The Commission should go a step further and

²⁰ The RMD is a database in which voice service providers certify to the steps they have taken to prevent illegal call traffic.

²¹ The Commission generally requires providers to take steps to prevent new or renewing customers from placing illegal traffic on their networks but has not provided further detail on KYC requirement in its rules. The agency has, however, in enforcement actions, indicated further steps providers should take to when engaging in KYC diligence. See, e.g., *In the Matter of Lingo Telecom, LLC*, Order and Consent Decree, DA 24-790 (rel. August 21, 2024) at Att. I, Section III, Enhanced Know Your Customer (KYC) Measures for Customers.

require voice service providers to adhere to more robust KYC requirements – such as requiring the provider to understand the nature of the caller’s business – before allowing a caller to place calls on the provider’s network.

The misuse of numbering resources is another concern. If a caller seeks access to thousands of phone numbers in order to place millions of calls, the voice service provider should be required to examine the caller to understand why the caller seeks access to such a large pool of numbers from which to place calls. Providers should be required to refuse service to such callers unless they affirmatively find that the callers’ business is legitimate. For example, before granting such callers access to the network, providers should be required to confirm that the business is bonded, has a physical address, and is selling an actual product or service; and that the person operating the business has not been subject to extensive lawsuits for violating telemarketing laws. By strengthening KYC requirements on voice service providers, the Commission would make great strides toward keeping bad actors off the U.S. calling network.

* * *

These three improvements – IP transition deadlines, attestation enforcement, and clearer and stronger KYC requirements – are essential to restoring trust in caller ID authentication and achieving the original goals of the TRACED Act.

III. REQUIRE IDENTIFY AUTHENTICATION NOT JUST NUMBER VALIDATION

Strengthening the STIR/SHAKEN framework and protecting consumers from spoofed and fraudulent calls must move beyond simple number authentication to encompass authentication of the caller. STIR/SHAKEN as currently implemented provides no information regarding the identity of the caller or the legitimacy of the call. A more robust solution would incorporate the concept of branded calling, utilizing rich call data (RCD), which allows verified entities to

display their name and logo directly on the recipient's device. We appreciate that the Commission has sought comment in a separate proceeding to establish a framework for transmitting and displaying verifiable caller identity information.²² RCD is an extension of STIR/SHAKEN, and standards have been developed to enable providers to transmit the caller's identity and the reason for the call.²³ As long as originating providers engage in stringent verification of the caller, RCD enhances transparency and empowers consumers to make informed decisions about whether to answer a call.

However, as with number authentication, branded calling requires end-to-end IP connectivity to function. Legacy TDM network infrastructure strips authentication information and thus cannot support the transmission of RCD. For RCD to be deployed widely, legacy TDM equipment must be transitioned to IP. As such, the Commission and industry stakeholders must prioritize the modernization of network infrastructure to enable these advanced features. Without a clear and enforceable timeline for IP migration, branded calling will remain limited to a subset of calls, undermining its potential impact to prevent fraud.

Equally important is the need for standardization. RCD must be implemented consistently across providers and platforms to ensure interoperability and prevent misuse. It must also be affordable. The Commission should undertake efforts to ensure uniform, standardized, and affordable call branding options and articulate clear and mandatory requirements for providers to ensure that caller identity information is appropriately established and displayed.

²² *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*, 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, paras. 51-54 (rel. Oct. 29, 2025).

²³ See *Signature-based Handling of Asserted Information Using toKENS (SHAKEN): Calling Name and Rich Call Data Handling Procedures*, ATIS-100094.2, April 30, 2025.

RCD represents a critical next step in the evolution of call authentication and the fight against illegal robocalls, but the appropriate safeguards must be in place for RCD to function as intended. Otherwise, implementation of the system will deliver no better results than the STIR/SHAKEN framework.

IV. ELIMINATE SPC TOKEN EXEMPTION AND THE EXEMPTION FOR NON-IP NETWORKS

In addition to reviewing the efficacy of STIR/SHAKEN every three years, the TRACED Act directs the Commission to assess annually the continuing need for exemptions from STIR/SHAKEN compliance. We urge the Commission to eliminate the remaining exemptions under STIR/SHAKEN that allow certain providers to avoid full compliance. In particular, the Public Notice seeks comment on the exemption for providers who claim they are unable to obtain a Service Provider Code (SPC) token. Providers need an SPC token in order to sign calls and implement STIR/SHAKEN. The requirements for obtaining an SPC token are: (1) obtain an Operating Company Number (OCN), (2) file FCC Form 499A for Universal Service contributions, and (3) be listed in the RMD. These steps demonstrate a provider's legitimacy and readiness to participate in the caller ID authentication ecosystem. By continuing to allow exemptions based on SPC token access, providers can originate and transmit calls that are unsigned. This undermines the accountability and traceability that STIR/SHAKEN is designed to enforce.

Another exemption that must be addressed is the exemption for non-IP networks from call authentication. While the Commission has acknowledged the technical limitations of implementing STIR/SHAKEN on TDM infrastructure, the persistence of this exemption creates a significant gap in the authentication chain, as we have explained above. Calls that originate or

traverse non-IP segments lose their authentication headers, rendering them unverifiable downstream and vulnerable to spoofing. The Commission has proposed alternative frameworks for non-IP call authentication, which the Associations have supported.²⁴ Concomitant with either the transition to IP or a deadline for adoption of an alternative solution, the Commission should eliminate the exemption for non-IP networks and consider only individual waivers or exemptions where applicants can demonstrate compelling reasons for the continued use of TDM infrastructure, such as where disconnection is the only feasible alternative to continued use of TDM equipment.

Eliminating these exemptions is critical to restoring trust in voice communications. Providers that originate calls must be held to the same standards, regardless of network type or business model. The Commission should move swiftly to close these loopholes, enforce compliance across the board, and ensure that every provider contributing to the call path is accountable for the authenticity of the traffic they transmit.

V. STRENGTHEN THE SECURE TELEPHONE IDENTITY-GOVERNANCE AUTHORITY

In 2018, the telecommunications industry organized the Secure Telephone Identity-Governance Authority (STI-GA) as the governing authority to set policy for use of the STIR-SHAKEN framework.²⁵ Among other responsibilities, the STI-GA is charged with protecting the STIR-SHAKEN framework against potential misuse of “signing” authority – i.e., with protecting

²⁴ See *In the Matter of Call Authentication Trust Anchor*, WC Docket No. 17-97, Comments of American Bankers Association et al. (July 16, 2025), <https://www.fcc.gov/ecfs/document/107161568110562/1>.

²⁵ Secure Telephone Identity-Governance Authority, *2024 STI-GA SHAKEN Report*, <https://cdn.atiss.org/sti-ga.atiss.org/2025/02/19165205/2024-STIGA-Public-Report-Final.pdf> (Feb. 19, 2025) (*2024 STI-GA SHAKEN Report*).

the framework against voice service providers that improperly sign calls placed by bad actors.²⁶

The STI-GA defines improper attestation as, “any call where an originating service provider (“OSP”) signs a call with a level of Attestation inconsistent with the information it has, or is required to have, about the call.”²⁷

The STI-GA, an industry self-policing organization, accepts complaints that service providers are improperly signing calls. For example, in 2024, the STI-GA addressed eight separate complaints filed by state attorneys general against voice service providers that alleged the provider improperly signed calls.²⁸ Ultimately, the STI-GA revoked the signing tokens of only *one* provider. Three providers were put on six-month probationary terms. The STI-GA revoked one provider’s signing token temporarily but subsequently reinstated the token. Action against two providers is pending, as of the STI-GA’s 2024 annual report (the most recent report available). The STI-GA provided no information on the eighth complaint.

The STI-GA has established an extensive process for reviewing these complaints, but the process is entirely opaque, subject to limited Commission oversight.²⁹ The organization provides no publicly available information on its review, the factors it considered, or the basis for its decisions. These determinations, however, are critical to ensuring that bad actors are not allowed to continue placing illegal calls into the network. The Commission should encourage the STI-

²⁶ See Secure Telephone Identity-Governance Authority, <https://sti-ga.atis.org/> (last visited Nov. 10, 2025) (explaining that the STI-GA works with Alliance for Telecommunications Industry Solutions to define the rules governing which providers can obtain a certificate allowing them to provide a “digital signature” to authenticate an outbound call).

²⁷ Secure Telephone Identity-Governance Authority (last visited Nov. 10, 2025), [230724-Improper-Auth-and-Attest-Def-Final.pdf](#).

²⁸ 2024 STI-GA SHAKEN Report, *supra* note 25, at 2.

²⁹ *Call Authentication Trust Anchor; Appeals of the STIR/SHAKEN Governance Authority Token Revocation Decisions*, WC Docket 17-97 and 21-291, Third Report and Order, 36 FCC Rcd 12878, paras. 12-28 (2021) (adopting rules enabling voice service providers to appeal an adverse decision from the STI-GA to the Commission).

GA to be transparent in its review processes so that the public, and callers in particular, can understand the basis of the organization’s decision-making.

A recurring problem undermining trust in the network is the practice of sanctioned bad actors simply reappearing as new companies. Although the Commission has taken some steps to identify such practices,³⁰ the STI-GA should promulgate policies that would require, as a condition of obtaining a token, a provider to identify any prior entity under common control that had its token revoked.

We also urge the Commission to require the STI-GA to hold one or more seats on its board of directors for a member from a business that places calls to customers, and at least one seat for an organization with a consumer protection mission and a history of litigating before the Commission on behalf of consumers. Certain voice service providers improperly sign calls, allowing bad actors to spoof the name and phone numbers of legitimate businesses. Yet, no caller is represented among the STI-GA. Nearly all members of the STI-GA represent telecommunications companies³¹ – even though the STI-GA is the body that sanctions telecommunications companies that improperly sign calls. Adding one or more business callers to the STI-GA would better ensure that it takes appropriate action to stop companies that improperly sign calls and prevent individuals at those companies from establishing new “shell” telecommunications companies to continue their illegal conduct.

³⁰ See 47 C.F.R. § 6305(d)(4)(iii) (requiring RMD filer to disclose any names previously used).

³¹ See Secure Telephone Identity-Governance Authority, <https://sti-ga.atis.org/> (last visited Nov. 10, 2025) (listing members of the STI-GA’s Board of Directors).

CONCLUSION

The Associations urge the Commission to act quickly to implement these much-needed improvements to the STIR/SHAKEN framework. These changes will enable the Commission to uphold the policy goals of the TRACED Act and curb illegal robocall traffic.

Respectfully submitted,

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APPENDIX

ACA International (ACA) 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.

America's Credit Unions (ACU) 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 American Bankers Association (ABA) is the voice of the nation's \$25 trillion banking industry, which is composed of small, regional and large banks that together employ approximately 2.1 million people, safeguard \$19.7 trillion in deposits and extend \$13.1 trillion in loans.

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.

The Bank Policy Institute (BPI) is a nonpartisan public policy, research and advocacy group representing the nation's leading banks. BPI members include universal banks, regional bank and the major foreign banks doing business in the United States. Collectively, BPI members employ nearly two million Americans, make nearly half of the nation's small business loans and are an engine for financial innovation and economic growth.

The Defense Credit Union Council (DCUC) is the trusted resource for credit unions on all military and veteran matters. DCUC champions the interests of America's credit unions serving our military and veteran communities.

The Independent Community Bankers of America (ICBA) has one mission: to create and promote an environment where community banks flourish. ICBA powers the potential of the nation's community banks through effective advocacy, education, and innovation. As local and trusted sources of credit, America's community banks leverage their relationship-based business model and innovative offerings to channel deposits into the neighborhoods they serve, creating jobs, fostering economic prosperity, and fueling their customers' financial goals and dreams.

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 National Council of Higher Education Resources (NCHER) mission is to provide superior advocacy, communications, regulatory analysis and engagement, and operational support to its members so they may effectively help students and families develop, pay for, and achieve their career, training, and postsecondary educational goals.

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.

The National Consumer Law Center (NCLC) is a non-profit legal services program that uses the tools of advocacy, education, and litigation to fight for economic justice for low-income and other vulnerable people who have been abused, deceived, discriminated against, or left behind in our economy.