Before the
Federal Communications Commission
Washington, D.C.

In the Matter of	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	))	CG Docket No. 17-59

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, NATIONAL COUNCIL OF HIGHER EDUCATION RESOURCES, PAYMENTS LEADERSHIP COUNCIL, AND STUDENT LOAN SERVICING ALLIANCE TO THE FURTHER NOTICE OF PROPOSED RULEMAKING

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INTRODUCTION AND SUMMARY

The American Bankers Association (ABA), 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, National Council of Higher Education Resources, Payments Leadership Council, and Student Loan Servicing Alliance (collectively, the Associations)[1] appreciate the opportunity to comment on the Federal Communications Commission's (Commission or FCC) Further Notice of Proposed Rulemaking to enhance "know-your-upstream-provider" (KYUP) requirements and strengthen the "STIR/SHAKEN" caller ID authentication framework.[2]

Fraud and scams continue to be a pervasive problem that often takes an extraordinary financial and emotional toll on consumers. In a December 2025 report, the Federal Trade Commission estimated that 2024 fraud and scam losses totaled a staggering $196 billion.[3] A separate 2026 report found that, in 2025, 6% of U.S. adults – an estimated 15.1 million people – say they were scammed out of money.[4]

Banks, credit unions, and other financial service providers see firsthand the enormous harm caused by criminals who impersonate trusted financial institutions in illegally "spoofed" calls to consumers and businesses. Individual bankers recently submitted dozens of comments in

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[1] A description of each Association is provided in the Appendix.
[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 26-32 (rel. May 21, 2026) [hereinafter, *Proposal*].
[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.
[4] 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).

a parallel FCC proceeding that described the harm that criminals perpetrate through illegal calls.[5] Bank comments 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] We commend the Commission for recently issuing a warning to alert consumers to bank impersonation scams.[7] This advisory complements our industry's ongoing efforts to educate consumers about impersonation scams, such as through ABA's #BanksNeverAskThat campaign.[8]

The financial services industry spends billions of dollars each year to educate and protect consumers and businesses from fraud and scams, investigate/refer potential criminal activity, and help affected customers recover their hard-earned money.[9] But financial institutions cannot do this work alone. Existing Commission regulations require each voice service provider that originates calls (originating provider) to take "affirmative, effective measures" to prevent callers from "originat[ing] illegal calls, including knowing its customers . . . ." (the Effective Measures

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[5] *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 banker comments) [hereinafter, *ABA Reply Comments*].
[6] *See id.* at 3-5, n.5-7 and accompanying text.
[7] Press Release, Fed. Commc'ns Comm'n, FCC Consumer Alert: Bank Impersonation Scams: Bank Imposters Pressure Consumers to Take Immediate Action to Protect Their Money (July 21, 2026).
[8] Am. Bankers Ass'n, *#BanksNeverAskThat*, https://www.banksneveraskthat.com/ (last visited Aug. 5, 2026).
[9] *See* Joseph Ibitola, *Overcoming the Hidden Costs of AML Compliance*, Flagright (updated July 1, 2025), https://www.flagright.com/post/overcoming-the-hidden-costs-of-aml-compliance#:~:text=AML%20compliance%20has%20become%20an,a%20financial%20firm's%20annual%20revenue (reporting that, globally, banks and fintech companies spend an estimated $206 billion per year on financial crime compliance); *ABA Reply Comments*, *supra* note 5, at 6 (summarizing banker comments describing how banks devote substantial resources on fraud detection, customer education, and authentication protocols to protect customers).

Rule).[10] In 2023, the Commission broadened the Effective Measures Rule to require every provider in the call's pathway to take "reasonable and effective steps" to ensure that it does not transmit illegal calls, even if the provider did not originate the call.[11] However, the Commission has "not mandate[d] specific measures to comply with" these rules.[12] Consequently, bad-actor callers exploit originating providers who perform no diligence, or the most minimal amount of diligence, before granting "A-level" attestation to a call—the highest form of caller number authentication that can be assigned to a call under the Commission's STIR/SHAKEN caller ID authentication framework.[13] An improper A-level attestation falsely signals that the originating provider knows the caller and knows the caller has the legal right to use the number that will be displayed in the recipient's caller ID.[14] Upon receiving an A-level attestation, a terminating provider may apply a green "checkmark" or other signal indicating the number is not illegally spoofed, and the call recipient may infer that the call is from a legitimate source.

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[10] 47 C.F.R. § 64.1200(n).

[11] *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor,* Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, ¶¶ 49-51 (rel. May 19, 2023), https://docs.fcc.gov/public/attachments/FCC-23-37A1.pdf, *codified at* 47 C.F.R. § 64.1200(n)(5).

[12] *In the Matter of Telnyx LLC*, File No. EB-TCD-24-00037170, FCC 25-10, ¶ 2 (Feb. 4, 2025), https://docs.fcc.gov/public/attachments/FCC-25-10A1.pdf (summarizing 47 C.F.R. § 64.1200(n)(4)); *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Fourth Report and Order ¶ 34 (Dec. 30, 2020), https://docs.fcc.gov/public/attachments/FCC-20-187A1.pdf (promulgating regulation that gave voice service providers "flexibility" in meeting KYC requirements).

[13] For additional discussion of the STIR/SHAKEN attestation levels, see *infra* notes 18 and 20-21 and accompanying text.

[14] *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).

Available data underscore that an A-level attestation is no longer a reliable indicator of whether a number has been illegally spoofed. As ABA recently shared with the Commission, an ABA consultant analyzed call data showing that an estimated 9 million illegally spoofed calls were "signed" with an attestation level by the originating provider.[15] These calls were delivered to their recipients even though the calls passed through one or more other providers—any one of which could have blocked the illegal call but did not. These "downstream" providers often take few steps to ensure they transmit only legal calls, and not fraudulent or scam calls. Our Associations have long called for the Commission to take action to ensure consumers can rely on the information displayed in the caller ID – i.e., that the name and number displayed accurately reflects who placed the call.[16]

We commend the Commission for issuing the Proposal to stop illegal calls at every stage of the calling ecosystem. We strongly support the Commission's proposal to specify the criteria that originating (or initiating) providers must satisfy before providing an attestation level to a call. We also strongly support the Commission's proposal to require voice service providers to take specific, affirmative steps to know the providers from which they accept call traffic, to monitor those providers' traffic and compliance practices, and to refuse or discontinue service

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[15] *ABA Reply Comments*, *supra* note 5, at 6-9.
[16] *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, Comments of Am. Bankers Ass'n *et al.* 17 (Aug. 9, 2023), https://www.fcc.gov/ecfs/document/108100286505590/1 (calling for the Commission to require voice service providers to confirm a caller's name and phone number before permitting it to appear on a caller ID display); *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*., 22 (filed Jan. 5, 2026), https://www.fcc.gov/ecfs/document/10106019480304/1 (same) [hereinafter, *ABA/Joint Trades' Jan. 2026 Comments*].

when the evidence shows that an upstream provider is facilitating illegal calls. These requirements are a necessary complement to the Commission's separate proposal to impose stronger "know-your-customer" (KYC) requirements on originating providers.[17] Together, these reforms will help ensure that every entity in the call path takes meaningful responsibility for keeping illegal calls off the U.S. calling network. We also urge the Commission to allocate sufficient funding and staffing to enforce its KYUP and KYC rules—i.e., to have sufficient staff to investigate and, where appropriate, initiate enforcement actions to ensure that providers comply with these rules.

ARGUMENT

I. The Commission Should Increase Requirements for Providing A-Level and B-Level Attestation to Prevent Bad-Faith Originating Providers from Assigning Inaccurate Attestation Levels to Calls

The Commission's work to combat fraud has centered on a requirement that voice service providers adopt the STIR/SHAKEN call authentication framework – an industry-developed framework whereby calls are "signed" at origination with different levels of "attestation"—A-level, B-level, or C-level.[18] That attestation level is then passed through the call's pathway and verified by the terminating provider delivering the call to the consumer or other recipient. But this authentication framework keeps illegally spoofed calls from traversing the U.S. calling network only if the attestation conveys accurate information—and too often, it does not. The

[17] *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). The Associations expressed our support for stronger "know-your-customer" requirements for originating providers in our comment submitted on June 25, 2026. *See id.*, Comments of Am. Bankers Ass'n *et al.* (filed Jun. 25, 2026), https://www.fcc.gov/ecfs/document/26109920374/1.

[18] *See* Fed. Commc'ns Comm'n, Combating Spoofed Robocalls with Caller ID Authentication (last visited July 30, 2026), https://www.fcc.gov/call-authentication.

Associations strongly support the Commission's proposal to strengthen the standards for A-level and B-level attestations.

We agree with the Commission that current requirements for A-level and B-level attestations (the highest attestations levels) do not provide sufficient assurance that the caller has lawful access to the number that is displayed in the recipient's caller ID because bad-faith originating providers are assigning A-level and B-level attestations to calls that do not qualify.[19] A call that receives an "A-level" attestation means the originating provider knows the caller and knows the caller has the legal right to use the number that will be displayed in the recipient's caller ID.[20] 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.[21] But one analysis conducted for ABA, and cited in the Proposal, examined 12,900 calls that illegally spoofed telephone numbers belonging to 47 large banks, retailers, and healthcare providers.[22] The analysis found that more than half of the illegal calls received an A-level or B-level attestation.[23] Clearly, originating providers are not consistently providing an A-level attestation only to calls where the provider knows the caller and knows the caller has the legal right to the number that

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[19] *See Proposal*, *supra* note 2, ¶¶ 56 & 58. In this comment, we use the term "bad-faith originating providers" to describe providers who perform no diligence, or the most minimal amount of diligence, before granting an attestation level to a call.
[20] *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).
[21] *Id.* C-level attestation means the originating provider does not know the caller or whether the caller has lawful access to the number. *Id.*
[22] *ABA/Joint Trades' Jan. 2026 Comments*, *supra* note 16, at App. C, 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. *Id.*
[23] *Id.*

will be displayed in the recipient's caller ID. When an illegally spoofed call receives an A-level or B-level attestation, the call appears more trustworthy and is less likely to be blocked.

The Commission has identified a key vulnerability in the Effective Measures Rule: the Rule does not require originating providers to take specific steps to verify a call qualifies for A-level or B-level attestation.[24] Consequently, providers are "skirt[ing] their attestation responsibilities" by providing an A-level or B-level attestation without first determining that the call qualifies for that attestation level, as the Commission concluded.[25] We agree with the Commission that originating providers who did not provide the number to its customer should no longer be permitted to rely on the customer's general statement that it will place calls only from numbers to which it has the legal right.[26] Instead, as we previously urged, the Commission should require originating providers to demonstrate that its customer has the legal right to the number that will be displayed in the recipient's caller ID.[27] We commend the Commission for specifying criteria that originating providers must satisfy before providing an A-level, B-level, or C-level attestation to a call.[28]

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[24] *See Proposal*, *supra* note 2, ¶ 60.
[25] *Proposal*, *supra* note 2, ¶ 60.
[26] *See Proposal*, *supra* note 2, ¶ 65. We also agree with the Commission that, if a number is on a "do not originate" list, it is clear that the originating provider's customer does not have the legal right to place calls that will display that number on the recipient's caller ID. *See id.*
[27] *See ABA/Joint Trades' Jan. 2026 Comments*, *supra* note 16, at 24 (urging the Commission to require originating providers to verify that the caller has the legal right to use the number displayed in the recipient's caller ID display before providing an A-level attestation for the call).
[28] *See Proposal*, *supra* note 2, ¶¶ 60-66. The Commission also proposes to require voice service providers that sell voice service to callers—but where another provider performs the underlying call origination—to make the appropriate STIR/SHAKEN attestation for those calls. *Id.*, ¶ 110. We support this proposal because providers that serve callers directly are often in the best position to know who their customers are and whether those customers are authorized to use the telephone numbers associated with their calls, even if another provider originates the call.

Imposing requirements for granting these attestation levels will hold providers accountable for the calls that originate on their networks. Moreover, it will eliminate "carrier-shopping" by bad actor callers, protect financial institutions and other legitimate businesses from harmful spoofing, and restore public trust in the communications network. Indeed, assigning accurate attestations to outbound calls is particularly important for calls that appear to come from banks, credit unions, and other trusted institutions. Fraudsters rely on caller ID spoofing because consumers are more likely to answer and trust a call that appears to come from a familiar financial institution. If an A-level attestation is applied to these calls without meaningful verification—as happens today—the authentication framework inadvertently strengthens the fraudster's ability to deceive the consumer.

II. The Commission Should Adopt Specific KYUP Requirements That Require Providers to Know, Verify, Monitor, and Act on Information About Their Upstream Providers

In addition to its proposal to strengthen the standards for attestations, the Commission proposes to establish specific requirements to ensure voice service providers "know their upstream provider" (KYUP) – i.e., have conducted diligence on the originating or other "upstream" provider from which the downstream provider is receiving call traffic. The proposed KYUP requirements are an important complement to the Commission's proposed attestation standards. Today, when bad-faith originating providers allow illegal calls to be originated on their networks, those calls pass through downstream providers that could block the call—but often do not. We strongly support the Commission's proposal to impose specific KYUP requirements on all voice service providers in the call's pathway.

The existing regulation (the Effective Measures Rule) requires a downstream provider to ensure that any upstream "provider . . . from which it directly receives traffic is not using the [downstream] provider to carry or process a high volume of illegal traffic onto the U.S.

network."[29] But the Effective Measures Rule does not impose minimum diligence, documentation, monitoring, or response expectations. Consequently, it allows downstream providers to claim compliance while continuing to transmit unlawful traffic. We agree with the Commission that downstream providers have a financial incentive to partner with bad-faith originating providers or other upstream providers without conducting meaningful diligence on the upstream provider or the calls that provider is originating/transmitting.[30] That must change.

The Commission has proposed requirements that all downstream providers must follow before entering into an agreement with any upstream provider (or renewing an existing agreement): (1) that downstream providers collect specific information from the upstream provider; (2) that downstream providers perform specific due diligence of upstream providers' compliance with the Commission's rules; (3) that downstream providers conduct due diligence to verify the validity and authenticity of the information provided by the upstream provider as part of the onboarding process; (4) that downstream providers monitor the upstream provider's compliance with the Commission's rules and monitor the types of calls that the upstream provider is transmitting to the downstream provider; and (5) that downstream providers perform a "holistic, totality-of-the-circumstances evaluation of each upstream provider" based on the steps described above, and to refuse or discontinue service if the downstream provider determines the upstream provider is transmitting illegal calls.[31] We support these proposed

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[29] 47 C.F.R. § 64.1200(n)(5).
[30] *See Proposal*, *supra* note 2, ¶ 14 (expressing the Commission's belief that, "for some providers, the incentive to enter into business with other providers to drive revenue growth deters them from instituting even the most basic practices to evaluate their upstream providers").
[31] *See Proposal*, *supra* note 2, ¶¶ 20-31.

requirements, which will better ensure that downstream providers do not transmit illegal calls.[32] We also support the Commission's proposal to require providers to establish specific policies and procedures to comply with the Commission's KYUP requirements.[33]

CONCLUSION

Illegal spoofed calls that impersonate banks, credit unions, and other legitimate businesses inflict serious harm on consumers and undermine trust in the U.S. telecommunications network. The Associations commend the Commission for proposing to strengthen STIR/SHAKEN attestation standards and KYUP requirements. By adopting these proposed revisions, the Commission can reduce consumer harm, improve accountability across the voice ecosystem, strengthen the value of caller ID authentication, and better protect consumers and legitimate businesses from impersonation scams and other types of fraud.

Respectfully submitted,

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[32] We also support the Commission's proposed revision to the Effective Measures Rule to make clear that all voice service providers must take specific measures to prevent an upstream provider from using its network to transmit *any* illegal call, not a "high volume of illegal traffic." *Id.*, ¶ 19.
[33] *See id.*, ¶ 33.

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APPENDIX

The American Bankers Association is the voice of the nation's $26.1 trillion banking industry, which is composed of small, regional and large banks that together employ over 2 million people, safeguard $20.5 trillion in deposits and extend $13.7 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.

The National Council of Higher Education Resources' 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.

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.

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 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.