Before the
Federal Communications Commission
Washington, D.C.

In the Matter of	)	
	)	
Empowering Consumers through a Robocall Scorecard	)	CG Docket No. 26-239
	)	

COMMENTS OF THE AMERICAN BANKERS ASSOCIATION, AMERICAN FINANCIAL SERVICES ASSOCIATION, AMERICA'S CREDIT UNIONS, BANK POLICY INSTITUTE, CONSUMER BANKERS ASSOCIATION, DEFENSE CREDIT UNION COUNCIL, ELECTRONIC TRANSACTIONS ASSOCIATION, MORTGAGE BANKERS ASSOCIATION, AND PAYMENTS LEADERSHIP COUNCIL TO THE PUBLIC NOTICE

Jonathan Thessin
Vice President/Senior Counsel
American Bankers Association
1333 New Hampshire Avenue, NW
Washington, DC 20036
(202) 663-5016

Philip Bohi
General Counsel
American Financial Services Association
1750 H St NW Suite 650
Washington, DC 20006
(202) 466-8605

James Akin
Head of Regulatory Advocacy
America's Credit Unions
99 M Street, SE
Washington, DC 20003
(800) 356-9655

Drew Ruben
Senior Vice President, Associate General Counsel
Bank Policy Institute
1300 Eye Street, NW
Washington, DC 20005
(202) 589-2443

Brian Fritzsche
Vice President, Associate General Counsel
Consumer Bankers Association
1225 New York Ave., NW
Washington, DC 20005
(202) 552-6381

Jason Stverak
Chief Advocacy Officer
Defense Credit Union Council
1627 Eye Street, NW, Suite 935
Washington, DC 20006
(202) 734-5007

Patrick Russell
Vice President of Government Affairs
Electronic Transactions Association
1300 Connecticut Ave NW, Suite #475
Washington, DC 20036
(202) 828-2635

Alisha Sears
Director, Regulatory Counsel
Mortgage Bankers Association
1919 M Street, NW, 5th Floor
Washington, DC 20036
(202) 557-2930

Andrew Barbour
Acting Executive Director
Payments Leadership Council
1307 New York Avenue, NW, 6th Floor
Washington, DC 20005
(202) 669-4823

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INTRODUCTION AND SUMMARY

The American Bankers Association (ABA), American Financial Services Association, America's Credit Unions, Bank Policy Institute (BPI), Consumer Bankers Association, Defense Credit Union Council, Electronic Transactions Association, Mortgage Bankers Association, and Payments Leadership Council (collectively, the Associations)[1] appreciate the opportunity to comment on the Consumer and Governmental Affairs Bureau's proposed Robocall Mitigation Scorecard (Scorecard).[2]

The Associations strongly support the Commission's continued efforts to use every available tool to protect consumers from illegally spoofed calls and to restore trust in the nation's communication networks. Fraudsters routinely use illegally spoofed calls to impersonate banks, credit unions, nondepository financial institutions, payment providers, government agencies, law enforcement, and other trusted organizations, causing substantial financial harm to consumers. A recent survey of banks indicates that these scams are on the rise.[3] Illegally spoofed calls and texts can facilitate the theft of log-in credentials and takeover of a consumer's or business' account, and lead to fraudulent transfers and other substantial losses.[4]

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[1] A description of each Association is provided in the Appendix.

[2] Public Notice, *In the Matter of Empowering Consumers through a Robocall Scorecard*, Consumer and Governmental Affairs Bureau Seeks Comment on Robocall Scorecard, CG Docket No. 26-239 (rel. Sept. 2, 2026) [hereinafter, *Public Notice*].

[3] *See* Tara Payne, Drew Ruben & Madison Stulga, Bank Policy Institute, *Hijacking Trust: How Scammers Exploit the Banking System's Most Valuable Asset* (July 20, 2026), https://bpi.com/wp-content/uploads/2026/07/Hijacking-Trust-How-Scammers-Exploit-the-Banking-Systems-Most-Valuable-Asset.pdf. The survey of 14 BPI member banks found that the average number of identified bank-impersonation scams originated by a phone call or text message increased 124 percent from 2024 to 2025. *Id.* at 2. Two surveyed banks reported that 40 percent of calls appearing to originate from bank-owned numbers had been spoofed. *Id.*

[4] *See Protecting Seniors from AI Fraud: Hearing Before the S. Spec. Comm. on Aging*, 119th Cong. (2026) (testimony of Paul Benda, Exec. Vice Pres. for Risk, Fraud & Cybersecurity, Am. Bankers Ass'n) (describing specific harms to consumers that often result from illegally spoofed

We commend the Commission for its recent proposals to require all voice service providers in the call's pathway – from providers that originate calls to those who deliver calls to the call's recipient – to take meaningful steps to prevent illegally spoofed calls from reaching consumers.[5] An important complement to these proposals is the proposed Scorecard, which promises to provide consumers and businesses with better information about voice providers' effectiveness in combating illegal calls. This information will not only provide consumers and businesses with critical information to inform their choice of voice service providers; presumably, the Scorecard's information should also incent voice service providers to do more to combat illegal spoofing.

We encourage the Commission to produce a Scorecard that provides quantitative measures of how effectively voice service providers keep illegally spoofed calls off their networks—and does not rate providers solely on their compliance with existing laws. Therefore, we support the Commission's proposal to include "outcome-based metrics" on the Scorecard. In addition, we urge the Scorecard to provide information on the number of illegally spoofed calls that pass through the provider's network that are *not* blocked as a percentage of the total volume of calls that pass through the provider's network. We strongly believe the Scorecard should

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calls), https://www.aba.com/advocacy/policy-analysis/testimony-of-paul-benda-on-protecting-seniors-from-ai-fraud.

[5] *See 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, FCC 26-27, Further Notice of Proposed Rulemaking (rel. May 1, 2026) (proposing to require originating providers to "know their customer"—i.e., to collect specific information about a prospective customer—before that customer may originate calls on the provider's network) [hereinafter, *KYC Proposal*]; *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, FCC 26-32, Further Notice of Proposed Rulemaking (rel. May 21, 2026) (proposing to strengthen the "STIR/SHAKEN" call authentication framework and impose "know your upstream provider" requirements on "downstream" providers) [hereinafter, *KYUP Proposal*].

encourage prevention, not merely removal of illegally spoofed calls after they have entered the provider's network.

We also recommend that the Commission provide a Scorecard rating to all voice service providers in the call's pathway – including originating and intermediate providers – and not solely to providers that deliver calls to their recipients (terminating providers), as the Commission has proposed. This approach should create market pressure for originating and intermediate providers to take more action to avoid originating or transiting illegally spoofed calls—as well as encourage enterprise callers, including our members, to avoid doing business with providers that rate poorly in the Scorecard. We also encourage the Commission to rate wireless providers based on their effectiveness in keeping illegal text messages off their network and to publish the Scorecard in a consumer-friendly format that is understandable to non-experts, including clear explanations of each metric displayed in the Scorecard.

ARGUMENT

I. The Scorecard Should Provide Quantitative Measures That Reflect Voice Service Providers' Success Combatting Illegally Spoofed Calls

The Associations support the Commission's proposal to create a Scorecard that provides quantitative measures of how well voice service providers are keeping illegally spoofed calls off their networks. Providers that filed required paperwork in the Robocall Mitigation Database and adopted plans to mitigate illegal calls may nonetheless be permitting a substantial volume of illegally spoofed calls on their networks. We agree with the Commission that the Scorecard should provide "outcome-based metrics"[6] – i.e., the Scorecard should reflect what actually occurs on a provider's network.

[6] *Public Notice*, *supra* note 2, ¶ 14.

In determining which outcome-based metrics to require, we urge the Commission not to treat the total number of illegally spoofed calls blocked by a provider as evidence of success. A provider may block millions of calls but still permit a large number of illegal calls to transit the provider's network. Conversely, an originating provider with effective controls to ensure the provider "knows [its] customers" or, for downstream providers, "knows [its] upstream provider" may have few illegally spoofed calls to block. Therefore, the Commission should focus on the number of illegally spoofed calls that pass through the provider's network and are *not* blocked, reported as a percentage of the total volume of calls that pass through the provider's network.

We also support the Commission's proposal for the Scorecard to report data on erroneously blocked or mislabeled legitimate calls (the "false positive rate").[7] It is critical that fraud alerts, account-servicing calls, and other time-sensitive informational calls from banks, credit unions, and nondepository financial institutions reach their intended recipients and are not erroneously blocked, mislabeled, or otherwise impaired by call analytics and blocking solutions.

II. The Scorecard Should Cover All Voice Service Providers, Including Originating and Intermediate Providers, and Include Text Messages in the Scorecard

The Associations support the Commission's proposal to provide a Scorecard rating all wireless, wireline, and VoIP providers that serve retail customers, which includes both consumers and businesses that receive phone calls.[8] But the Commission should not stop there. The Commission also should provide a Scorecard rating to originating and intermediate providers that do not deliver (or "terminate") calls to the call's recipient. As the Commission has

[7] *Id.*
[8] *Id.*, ¶ 7.

recognized[9] – and as ABA-provided data affirms[10] – some originating providers do not adequately investigate the companies originating calls on the provider's network, allowing criminals to originate millions of illegally spoofed calls. In addition, intermediate providers that receive calls from originating or other "upstream" providers often take few steps to ensure they transmit only legal calls.[11] All of these providers should be included in the Scorecard.

This approach should create market pressure for originating and intermediate providers to take more action to avoid originating or transiting illegally spoofed calls. Terminating providers can assess the Scorecard's data and determine which upstream providers to do business with in the future. Similarly, enterprise callers, including our members, could incorporate provider performance data into procurement decisions by favoring providers that effectively protect consumer recipients by demonstrating strong KYC and KYUP performance and keeping illegally

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[9] *KYC Proposal*, *supra* note 5, ¶ 2 ("Although Commission rules already require originating providers to take 'affirmative, effective' measures to 'know[their] customers,' some originating providers do not do enough.") (internal citations omitted).

[10] *See, e.g., 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 (describing data that found that, during the first six months of 2026, an estimated 9 million illegally spoofed calls were "signed" by originating providers—i.e., the originating provider attested that the call was legitimate); *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 the Am. Bankers Ass'n *et al.*, App. C, 12-13 (filed Jan. 5, 2026), https://www.fcc.gov/ecfs/document/10106019480304/1 (describing analysis conducted for ABA that identified a fraudulent originating provider that increased its calling operations from originating no calls in July 2025 to more than 136 million calls by September 2025, demonstrating that the provider did not conduct diligence of the (bad actor) companies on whose behalf the provider originated calls).

[11] *KYUP Proposal*, *supra* note 5, ¶ 14 ("[W]e believe 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.").

spoofed calls off their networks. This would create additional commercial incentives for voice service providers to stop illegal calls from transiting the provider's network.

We also encourage the Commission to rate wireless providers based on their effectiveness in keeping illegal text messages off their network. Americans receive substantially more automated texts than automated calls.[12] Moreover, according to the Federal Trade Commission, consumers reported losing approximately $470 million to scams initiated through text messages in 2024, more than five times the amount reported in 2020.[13] These statistics underscore the growing importance of addressing illegal text-message campaigns. The Commission should rate providers on their effectiveness at preventing and stopping fraud committed through texts.

CONCLUSION

The Associations commend the Commission for proposing the Scorecard to provide information to consumers and businesses on the effectiveness of voice service providers' efforts to keep illegally spoofed calls off their networks. The Scorecard should emphasize measurable outcomes rather than compliance with existing laws and examine all providers in the call's pathway. If the Commission obtains reliable data and standardizes that data, banks and other callers make large-scale purchases of enterprise voice and internet services could incorporate provider performance data into procurement decisions by favoring providers that effectively protect consumers from illegally spoofed calls.

We urge the Commission to finalize the Scorecard without delay.

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[12] *See* Tonya Riley, *FCC Rules Aim[] to Curb Scourge of Robotexts Assaulting Americans' Phones*, Cyberscoop (Mar. 16, 2023), https://cyberscoop.com/fcc-robotext-scam-phishing-robocall/ (referencing data showing Americans received more than 225 billion "robotexts" in 2022 and over 78 billion "robocalls" during that period).

[13] Fed. Trade Comm'n, New FTC Data Show Top Text Message Scams of 2024; Overall Losses to Text Scams Hit $470 Million (Apr. 16, 2025), https://www.ftc.gov/news-events/news/press-releases/2025/04/new-ftc-data-show-top-text-message-scams-2024-overall-losses-text-scams-hit-470-million.

Respectfully submitted,

s//Jonathan Thessin
Jonathan Thessin
Vice President/Senior Counsel
American Bankers Association
1333 New Hampshire Avenue, NW
Washington, DC 20036
(202) 663-5016

s//Philip Bohi
Philip Bohi
General Counsel
American Financial Services Association
1750 H St NW Suite 650
Washington, DC 20006
(202) 466-8605

s//James Akin
James Akin
Head of Regulatory Advocacy
America's Credit Unions
99 M Street, SE
Washington, DC 20003
(800) 356-9655

s//Drew Ruben
Drew Ruben
Senior Vice President, Associate General Counsel
Bank Policy Institute
1300 Eye Street, NW
Washington, DC 20005
(202) 589-2443

s//Brian Fritzsche
Brian Fritzsche
Vice President, Associate General Counsel
Consumer Bankers Association
1225 New York Ave., NW
Washington, DC 20005
(202) 552-6381

s//Jason Stverak
Jason Stverak
Chief Advocacy Officer
Defense Credit Union Council
1627 Eye Street, NW, Suite 935
Washington, DC 20006
(202) 734-5007

s//Patrick Russell
Patrick Russell
Vice President of Government Affairs
Electronic Transactions Association
1300 Connecticut Ave NW, Suite #475
Washington, DC 20036
(202) 828-2635

s//Alisha Sears
Alisha Sears
Director, Regulatory Counsel
Mortgage Bankers Association
1919 M Street, NW, 5th Floor
Washington, DC 20036
(202) 557-2930

s//Andrew Barbour
Andrew Barbour
Acting Executive Director
Payments Leadership Council
1307 New York Avenue, NW, 6th Floor
Washington, DC 20005
(202) 669-4823

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APPENDIX

The American Bankers Association is the voice of the nation's $26.5 trillion banking industry, which is composed of small, regional and large banks that together employ over 2 million people, safeguard $20.7 trillion in deposits and extend $13.9 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.

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 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.

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.