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November 9, 2026

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Improving the Effectiveness of the Robocall Mitigation Database	)	WC Docket No. 24-213
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59

REPLY COMMENTS OF
FORTY-NINE (49) STATE ATTORNEYS GENERAL

I. INTRODUCTION

The undersigned State Attorneys General ("State AGs") submit these Reply Comments in response to the further public notice issued by the Wireline Competition Bureau.[1] This Current Further Notice seeks comment on the Federal Communications Commission's ("FCC" or "Commission") proposals that "aim to improve the effectiveness" of the Commission's Robocall Mitigation Database ("RMD" or "Database") by "seeking comment

[1] *See* Further Notice of Proposed Rulemaking, *Improving the Effectiveness of the Robocall Mitigation Database*, WC Docket No. 24-213, *Call Authentication Trust Anchor*, WC Docket No. 17-97, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59 (adopted July 22, 2026) (hereinafter "Current Further Notice" or "Notice").

Convene. Train. Support.

on measures to strengthen filing obligations and to deter bad actors and non-compliant providers from entering or remaining in the Database."[2] As its recent notices have also done,[3] the proposals in the Current Further Notice continue building on the Commission's successive efforts to combat illegal calls "at every point in the call path."[4] As reflected in reply comments filed with the FCC over the summer by broad bipartisan coalitions of state attorneys general,[5] there is close to unanimity from coast to coast of state attorneys general who continue to prioritize the issue of illegal calls. For this reason, the undersigned State AGs applaud and support the Commission's resolve

[2] *Current Further Notice* at ¶¶ 2, 7 ("[A]s the importance of the RMD has grown, the Commission's RMD rules and existing functionality must stay ahead of bad actors' ability to enter (or re-enter) the RMD and then transmit illegal calls on the U.S. voice network.").

[3] *See* Further Notice of Proposed Rulemaking, *Call Authentication Trust Anchor*, WC Docket No. 17-97, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59 (adopted May 20, 2026) (hereinafter "KYUP FNPRM"); Further Notice of Proposed Rulemaking, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278 (adopted Apr. 30, 2026) (hereinafter "KYC FNPRM"); Notice of Proposed Rulemaking, *Combatting Illegal Robocalls Through FCC Numbering Policies*, WC Docket No. 26-49, *Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket No. 20-67, *Numbering Policies for Modern Communications*, WC Docket No. 13-97, *Telephone Number Requirements for IP-Enabled Service Providers*, WC Docket No. 07-243 (adopted Mar. 26, 2026).

[4] *Current Further Notice* at ¶ 1 ("[The FCC] continues its effort to provide meaningful relief to consumers and restore trust in voice communications by tackling illegal calls at every point in the call path[.]").

[5] *See* Reply Comments of Forty-Nine (49) State Attorneys General, *Call Authentication Trust Anchor*, WC Docket No. 17-97, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59 (filed Sept. 8, 2026) (hereinafter "49 State AGs KYUP Reply Comments"); Reply Comments of Fifty (50) State Attorneys General, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278 (filed Jul. 27, 2026) (hereinafter "50 State AGs KYC Reply Comments"); Reply Comments of Forty-Nine (49) State Attorneys General, *Combatting Illegal Robocalls Through FCC Numbering Policies*, WC Docket No. 26-49, *Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket No. 20-67, *Numbering Policies for Modern Communications*, WC Docket No. 13-97, *Telephone Number Requirements for IP-Enabled Service Providers*, WC Docket No. 07-243 (filed Jul. 7, 2026) (hereinafter "49 State AGs Numbering Reply Comments").

to remain focused on this important issue that continues to plague consumers nationwide.

II. DISCUSSION

Because all voice service providers are "required to submit a filing in the RMD that includes critical information about their business and their robocall mitigation practices, *and* downstream providers are only permitted to accept calls from providers whose filings appear in the Database[,]"[6] the State AGs agree that "the Commission's RMD rules and existing functionality must stay ahead of bad actors' ability to enter (or re-enter) the RMD and then transmit illegal calls on the U.S. voice network."[7]

In November 2024, a bipartisan coalition of 47 state attorneys general filed reply comments in support of the Commission's then-ripe proposals "to increase accountability and accuracy among filings" in the RMD.[8] The state attorneys general wrote: "The RMD is an essential resource in State AGs' efforts to combat illegal robocalls. . . . The RMD can and should be more than a mere formality that bad actors glibly disregard."[9] As this remains true, the State AGs support those proposals in the Current Further Notice addressed herein.

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[6] *Current Further Notice* at ¶ 2 (emphasis added); *see Current Further Notice* at ¶ 3 ("Today, all voice service providers must submit a filing in the RMD that includes certifications, robocall mitigation information, business identifying information, provider type and service information, and a robocall mitigation plan via a portal accessible on the Commission's website[.]").

[7] *Current Further Notice* at ¶ 2.

[8] *See* Reply Comments of Forty-Seven (47) State Attorneys General, *Improving the Effectiveness of the Robocall Mitigation Database*, WC Docket No. 24-213, Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System, MD Docket No. 10-234 (filed Nov. 12, 2024) (hereinafter "47 State AGs 2024 RMD Reply Comments").

[9] *Id.* at 2.

A. Review of provider filings should be undertaken and completed before any provider is permitted to appear in the RMD

This Current Further Notice contains almost 140 paragraphs of proposals that, if successfully implemented, could allow the RMD to serve as *the* authoritative resource for promoting transparency and accountability for providers' robocall mitigation practices.[10] However, before turning to the proposed enhancements described and supported herein, State AGs believe the Commission's singular priority with respect to the RMD should first be to make sure that all information available to the public through the RMD is reviewed and determined to be both accurate and complete. Only then will the RMD become the reliable tool the Commission envisions.

As the Commission recognizes in the Current Further Notice, downstream providers can currently accept voice calls directly from any of the over 11,000 providers that appear in the RMD.[11] However, *limiting* a provider to "only" accept calls from upwards of 11,000 other providers is barely a niggling obstacle, if that, to safeguard the U.S. communications network against illegal call traffic.

The Current Further Notice suggests that, at present, a provider's filing can "appear" in the RMD before it has been accepted and published in the Database.[12] The Notice further indicates that Commission staff—or those to whom they may delegate any vetting responsibilities—do not currently have a practice of "reject[ing], withhold[ing] publication of, or plac[ing] into a pending status any new or updated filing that appears non-compliant, appears to have been submitted in evasion of the Commission's rules or orders, or otherwise requires further analysis before it [is] . . .

[10] *See Current Further Notice* at ¶ 2.

[11] *See id.* at ¶ 3 ("Downstream providers may only accept voice calls directly from another provider if that provider's filing appears in the Database and has not been removed pursuant to an enforcement action." (citing 47 C.F.R. § 64.6305(g))).

[12] *See id.* at ¶ 69.

accepted and published in the Database[.]"[13]

However, if a submitted filing is facially deficient or—upon mandated vetting for every submission—is determined to be substantively inaccurate beyond mere scriveners' errors or is otherwise non-compliant or evasive, such submissions should be rejected.[14] Rather, providers

[13] *See id.*

[14] *Cf.* Plaintiffs' Motion to Show Cause Why Defendant John C. Spiller, II Should Not be Held in Civil Contempt for Violating the Stipulated Order at 33, *State of Texas et al. v. Rising Eagle Capital Group LLC et al.*, No. 4:20-cv-02021 (S.D. Tex. 2020) (Doc. No. 265) ("In October 2023, [John] Spiller submitted a certificate of formation filing to the Texas Secretary of State's Office to create ATX Telco LLC ("ATX Telco"), as a limited liability company. On October 20, 2023, Spiller amended ATX Telco to make [his stepfather, who was a home inspector by trade, Harold] Speight the CEO and President of the company. Spiller made an FCC CORES filing for ATX Telco, listing Speight as the contact person and address. Spiller made an FCC 499 filing for ATX Telco, listing Speight as the CEO of the company. . . . Speight did not have any relationship with ATX Telco, and Speight was not the owner of ATX Telco. Speight testified that he did not know of and did not authorize Spiller's use of Speight's information on ATX Telco's Secretary of State filings. Speight did not know of and did not authorize Spiller's use of Speight's information on ATX Telco's CORES filings. Speight did not know of and did not authorize Spiller's use of Speight's information on ATX Telco's RMD filing. . . . Spiller used Every1 Telecom's phone number as ATX Telco's contact phone number. Spiller filed ATX Telco's 499 filing, using Speight as the contact without Speight's knowledge. Spiller filed ATX Telco's RMD filing using the name Richard Scott, a name that Spiller said he just made up." (citations omitted)); Transcript of January 24, 2024 Deposition of John Spiller, II at 186–87, *State of Texas et al. v. Rising Eagle Capital Group LLC et al.*, No. 4:20-cv-02021 (S.D. Tex. 2020) (Doc. No. 265-3) (providing the following colloquy regarding the data submitting in his filing in the RMD):

> Q. (By Mr. Yeoman) Do you know what this document is?
>
> A. Robocall Mitigation Database.
>
> Q. And for ATX Telco?
>
> A. Yes, sir.
>
> Q. Were you the one that filed this?
>
> A. Yes, sir.
>
> . . . .
>
> Q. It is—who—who—who signed—can you read the name that signed it at the bottom? At the last page.
>
> A. Richard Scott.
>
> Q. Who's Richard Scott?

should not get the benefit of appearing in the RMD if the information submitted would not be sufficient to withstand the rigors of a vetting process of the same information if it had been submitted and scrutinized in accordance with the proposals in the Commission's KYUP FNPRM or KYC FNPRM.

And on the point of benefits inuring to providers simply by appearing in the RMD, we refer the Commission to the insights shared in the September 2026 filing by state attorneys general on the KYUP FNPRM concerning the issuance of STIR/SHAKEN tokens.[15] The STIR/SHAKEN Governance Authority—the STI-GA—and representatives from leadership of the state attorneys general Anti-Robocall Multistate Litigation Task Force,[16] discussed how, in order for a voice service provider to be issued an SPC token, the provider must only have completed three relatively

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A. Just a made up figure that I made up.

Q. Is he another alias for you?

A. Nope.

Q. So Richard—

A. I would never use Richard Scott as an alias.

Q. So Richard Scott is nobody?

A. Nobody.

. . . .

Q. Okay. And then, what is the phone number 512-667—sorry—512-662-7221?

A. Just a fictitious number.

Q. That's not a real phone number?

A. No.

[15] *See 49 State AGs KYUP Reply Comments* at 23–26.

[16] The state attorneys general AG Anti-Robocall Multistate Litigation Task Force (alternatively "Task Force") is a 51-member bipartisan collective of State Attorneys General, led by the Attorneys General of Indiana, North Carolina, and Ohio, which is focused on actively investigating and pursuing enforcement actions against various entities in the robocall and robotext ecosystems that are identified as being responsible for significant volumes of illegal and fraudulent robocall and messaging traffic routed into and across the country.

ministerial tasks, one of which is filing an entry in the RMD.[17] The STI-GA indicated that it relies on the RMD to "adjudge the legitimacy and identity of a provider."[18] It relies on the RMD because that information is "both submitted to, and subsequently made public by, law enforcement," namely in the RMD by the Commission.[19] Thus, the STI-GA's position was that it would not need to take a more active role or set more detailed policies to scrutinize providers seeking access to the STIR/SHAKEN ecosystem because, in its view, it should be able to reasonably rely on the information in the RMD.[20] Consequently, and on this basis, the STI-GA reasonably countered: "why should industry be tasked with the responsibility of further scrutinizing the legitimacy and identity of providers?"[21]

In other words—as reflected, for example, in this recounted exchange with the Commission's designated STIR/SHAKEN Governance Authority—filings in the RMD have an imprimatur of legitimacy. Perhaps the Commission should clarify whether it intends to convey such legitimacy upon both the providers in the RMD and on the reliability of the information included therein. If it does not, and if the accuracy and completeness of the filings is not fully vetted and sanctioned by the FCC, then the Commission should not permit a filing in the RMD to be used to undergird the legitimacy of a voice service provider by allowing its use either (1) to grant *literal* keys (in the form of tokens and certificates) to the STIR/SHAKEN call authentication framework, or (2) to send call traffic into and across the U.S. communications network.

[17] *See 49 State AGs KYUP Reply Comments* at 24–25.

[18] *See id.* at 25.

[19] *See id.*

[20] *See id.*

[21] *See id.*

Finally on this point, it can take many months for a voice service provider to be removed from the RMD after the provider has been identified to have engaged in illegal conduct or noncompliance with the Commission's rules.[22] With this in mind, the State AGs urge the Commission to thoroughly review and vet all information submitted to the RMD for accuracy and completeness, before bestowing any purported legitimacy upon a provider by allowing its submission to appear in the RMD whereby it can immediately begin sending call traffic into and across the U.S. communications network. The bar for entry to access this country's telephone network should be more than a mere welcome mat.

B. State AGs maintain their support for disclosing related entities, the use of third parties, the legitimacy of claims of a domestic presence, the use of numbering resources, as well as identifying non-compliant and deficient RMD filings

In recent months, the Commission issued several notices of proposed rulemaking that reflected its comprehensive effort to "tackl[e] illegal calls at every point in the call path."[23] Although its primary focus is improving the functionality of the RMD, the Current Further Notice builds upon previous notices in important ways. Accordingly, the State AGs incorporate by reference the relevant portions of reply comments filed by bipartisan collectives of state attorneys general over the summer on these notices, including the specific portions highlighted herein.

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[22] *See, e.g.*, FCC Order, Final Determination Order and Removal Order – Belthrough LLC (released Mar. 12, 2026) https://www.fcc.gov/document/eb-issues-final-determination-order-against-belthrough-llc; FCC Order, Initial Determination Order and Order to Show Cause - Belthrough LLC (released Feb. 19, 2025), https://www.fcc.gov/document/fcc-issues-initial-determination-robocall-order-against-belthrough; FCC Cease & Desist Order, Notification of Suspected Illegal Traffic - Belthrough, LLC (released Sept. 10, 2025), https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-belthrough-llc.

[23] *Current Further Notice* at ¶ 1.

The State AGs continue to support independent filing obligations for related entities.[24] The state attorneys general have previously articulated their support for a consistent definition of "voice service provider" across the "caller ID authentication, telemarketing, Truth in Caller ID and all other Commission rules."[25] Parents, affiliates, and subsidiaries should file in the RMD independent of any related entity's filing when they meet this definition of a voice service provider, as was proposed by the Commission in the KYUP FNPRM earlier this year.[26] Independent filings by each entity meeting the definition of a voice service provider would help law enforcement, as well as industry members evaluating the providers with which they do business, identify relationships between voice service providers and would reduce the additional resources otherwise needed to find related organizations and principals.

The Current Further Notice proposes requiring providers to "submit additional information in the RMD regarding their use of third parties." [27] Specifically, providers would be required to provide an email address, phone number, and website for any third parties that they engage for four specified purposes: call analytics, call signing in accordance with STIR/SHAKEN, conducting KYC and KYUP, and filing RMD submissions.[28] The State AGs strongly support the disclosure of providers' use of third parties. Although state attorneys general have previously expressed that they do not believe it necessary for providers to retain third-party vendors in certain situations, such as conducting KYC verification,[29] the State AGs understand that outsourcing such responsibilities

[24] *Id.* at ¶ 16.

[25] *49 State AGs KYUP Reply Comments* at 38.

[26] *KYUP FNPRM* at ¶ 78.

[27] *Current Further Notice* at ¶ 38.

[28] *Id.*

[29] *See 50 State AGs KYC Reply Comments* at 13.

may be cost-effective for many providers. While the State AGs agree that the disclosure of information regarding providers' use of third parties will "promote accountability,"[30] the State AGs do not see a compelling reason for such disclosure to be available only to Commission staff.[31] To the extent that a provider's disclosure of its third party servicers will allow an evaluation of the legitimacy of those third parties, the State AGs believe that it would further the public interest for those disclosures to be made publicly to better inform the community as a whole.[32]

In the Current Notice, the FCC seeks comment about collecting additional information on related companies,[33] including prior business names and DBAs,[34] as well as codifying the requirement that corporate filers identify human principals.[35] In recent filings, state attorneys general supported FCC proposals to require more and complete information about principals and individuals involved in corporation leadership,[36] email address,[37] physical location,[38] and DBAs.[39] The State AGs continue to support FCC efforts to collect information from RMD filers that facilitates an accurate and complete vetting of the filing entities.

Describing a concern that "bad actor foreign providers may be establishing nominal offices, operations, or facilities in the United States (such as a hosted server or shared address) to falsely

[30] *Current Further Notice* at ¶ 38.

[31] *Id.* at ¶ 38 n.114.

[32] *Id.* at ¶ 63 n.178.

[33] *Id.* at ¶ 40.

[34] *Id.* at ¶ 42.

[35] *Id.* at ¶ 41.

[36] *49 State AGs KYUP Reply Comments* at 8–9.

[37] *50 State AGs KYC Reply Comments* at 10.

[38] *Id.* at 9.

[39] *Id.* at 10.

appear as a provider with bona fide independent business operations in the United States, and thereby avoid scrutiny of the provider and their calls,"[40] the Current Further Notice seeks comment on mandating additional filing requirements "to ensure that providers accurately identify when they are a foreign voice service provider."[41] The State AGs are aware that foreign voice service providers establish a nominal presence[42] in the United States in order to circumvent the increased scrutiny rightly applied to gateway service providers—this risk was the basis for the caution expressed in a prior filing regarding a proposal that sought to revise the definition of "foreign service provider."[43] As the current foreign voice service provider certification requirement is easily sidestepped,[44] the State AGs believe that the Commission should require all providers to "supply additional business information" to enable law enforcement "to evaluate whether those operations are a bona fide independent domestic business operation."[45]

The State AGs support the Commission's proposal that providers with access to numbering resources make that disclosure in their RMD filing.[46] The State AGs also support requiring

[40] *Current Further Notice* at ¶ 15.

[41] *Id.* at ¶ 47.

[42] A recent review of the RMD reveals that 61 providers—only two of which self-identify as foreign voice service providers—list a suite at "30 N Gould St., Sheridan, Wyoming 82801" as their business address.

[43] *See 49 State AGs KYUP Reply Comments* at 14 ("The State AGs are wary of these proposed definitions, as making the location of incorporation the sole measure of whether a voice service provider is foreign or domestic has the potential to encourage foreign bad actors to set up artificial U.S.-based corporations.").

[44] *47 State AGs 2024 RMD Reply Comments* at 3 ("For example, some providers who are headquartered outside of the United States and can originate foreign voice calls that terminate within the United States do not state that they are a foreign voice service provider in the RMD because they list a domestic mailing address or purchase access to a domestic third-party's Voice over Internet Protocol switching platform to transmit calls.").

[45] *Current Further Notice* at ¶ 47.

[46] *Id.* at ¶ 48.

providers to disclose whether they have access to those numbering resources directly or indirectly and, if indirectly, the provider from which they obtain that access. However, the State AGs do not think it necessary to require voice service providers to disclose the blocks or ranges of numbers to which they have access.[47] In previous reply comments, state attorneys general expressed support for the proposal that the North American Numbering Plan Administrator (NANPA) conduct numbering audits, given its familiarity with numbering administration, reporting and abuse.[48] The State AGs reiterate support for the Commission vesting NANPA with authority to oversee the administration of blocks of numbers to providers.

In proposing that providers submit general business information for inclusion in the RMD,[49] the Current Further Notice incorporates the majority of the Commission's KYUP information collection proposals, which state attorneys general strongly endorsed.[50] The 49 State AGs KYUP Reply Comments asserted that, for a downstream provider, the ability to "look deeper at a[n upstream] provider's credentials . . . should reduce bad actors' ability to transmit illegal calls."[51] The maintenance of the same information in the RMD would allow the entire ecosystem to look deeper into any provider's credentials, facilitating better-informed decisions about business relationships and, in the event that further inquiry is necessary, serving as a foundation for law enforcement investigations. The specific proposals advanced in the Current Further Notice should, the State AGs believe, build on and expand where necessary the existing disclosure requirements,

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[47] *Id.*

[48] *49 State AGs Numbering Reply Comments* at 10.

[49] *Current Further Notice* at ¶ 50.

[50] *49 State AGs KYUP Reply Comments* at 8 ("[S]pecific obligations for all providers to collect true, complete, and accurate information from and about their upstream providers customers will only better protect the U.S. telephone network and the consumers that rely on that network.").

[51] *Id.* at 9.

and the State AGs agree with the Commission that the costs of these requirements will be negligible should the KYUP proposals be adopted.[52]

Forty-seven state attorneys general filed reply comments in 2024 calling on the Commission to implement technological verification tools to identify RMD filings submitted with "blank, incomplete, inapplicable, misleading, or contradictory information.[53] The State AGs continue to support the Commission's proposal, as it is presented in the Current Further Notice, which proposes utilizing technology to identify non-compliant and deficient filings.[54] As the FCC is already tasked with implementing a technical data validation solution if the benefits outweigh the costs,[55] the State AGs encourage the FCC to consider the costs to consumers of unrelenting, unwanted scam and spam calls.[56]

The value of the actionable information the FCC could uncover by using computer programs designed to review large data sets and identify relationships therein could meaningfully reduce the number of bad actors in the RMD. The information gleaned from the use of technological tools could result in the removal of bad actors who currently can easily shut down or stop using one business because it is simple to start another. The State AGs strongly encourage the FCC to use approved technological tools to vet new entrants to the RMD and determine their relationship with

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[52] *Current Further Notice* at ¶ 50.

[53] *47 State AGs 2024 RMD Reply Comments* at 8.

[54] *Current Further Notice* at ¶ 75.

[55] RMD Order, 40 FCC Rcd 599, at 619 ¶ 43.

[56] Consumers report losing staggering amounts of money to scams—in 2025, imposter scams were responsible for $3.5 billion in consumer loss. Federal Trade Commission, *FTC Data Show People Reported Losing $3.5 Billion to Imposter Scams in 2025* (June 15, 2026), https://www.ftc.gov/news-events/news/press-releases/2026/06/ftc-data-show-people-reported-losing-3-point-5-billion-imposter-scams-2025. That number reflects imposter scams conducted by any means, including by text and phone.

known bad or questionable actors. Applying technological tools only after a provider has been approved to transmit calls on U.S. telecommunications networks gives a bad actor ample time to register a new company in the RMD and use it for nefarious purposes before the Commission can go through the procedural process to remove it.

Finally, the Current Further Notice seeks comment on "whether the Commission should establish better information sharing with the [STIR/SHAKEN] Governance Authority," furthering the proposals in the KYUP FNPRM to "strengthen the Governance Authority's oversight."[57] The 49 State AGs KYUP Reply Comments discussed at length the Governance Authority's current role in the ecosystem.[58] Writing that the Governance Authority "is most credibly positioned to restore . . . trust"[59] in the STIR/SHAKEN framework, state attorneys general endorsed the proposals contained within the KYUP FNPRM, including "support[ing] a more open reporting system regarding the Governance Authority's oversight and/or enforcement activity."[60]

Likewise, the State AGs support the information sharing proposed in the Current Further Notice.[61] Cooperation between the entities and organizations tasked with overseeing the voice call ecosystem results in more efficient and effective mitigation and enforcement, furthering our shared goal of eliminating illegal calls.

[57] *Current Further Notice* at ¶ 77.

[58] *See 49 State AGs KYUP Reply Comments* at 22–33.

[59] *Id.* at 23.

[60] *Id.* at 32.

[61] *Current Further Notice* at ¶ 77.

C. State AGs support RMD-specific proposals that would impact the ease with which bad actors could enter—or re-enter—the RMD

i. State AGs support the proposed methods of suspending and removing bad actors from the RMD

The Current Further Notice next seeks comment on the Commission's proposals to codify and clarify procedures for removing bad actors from the RMD once they are listed and enable it "to more effectively expel such providers from the voice ecosystem."[62] The State AGs applaud the Commission's efforts thus far to weed bad actors out of the voice communications system through its enforcement actions. We further support ongoing efforts by the Commission to improve and streamline processes for removing from the nation's communications system bad acting and complacent voice service providers when they facilitate the flow of harmful call traffic to consumers. The State AGs concur with each of the proposed causes for removal from the RMD listed in paragraph 80 of the Current Further Notice and recommend that a catch-all provision also be included to capture situations that are not specifically identified but are of a similar nature to those items on the list.

With regard to the issue of whether to apply a willful or "knew or should have known" standard to the conduct,[63] the State AGs encourage adoption of the "knew or should have known" standard to heighten accountability of those providers that choose to look the other way and not become familiar with their obligations.

The Current Further Notice additionally describes the various removal processes that the Commission has employed in the past and proposes to codify in its rules.[64] The State AGs support

[62] *Id.* at ¶ 79.

[63] *Id.* at ¶ 81.

[64] *Id.* at ¶¶ 82–86.

codifying processes that differentiate between those filings that are simply deficient but not "substantially or materially so," as well as those that are materially deficient and for circumstances where the provider knowingly or negligently originates, carries or processes illegal robocalls in contravention of the Commission rules or its RMD filing. The more serious violations should be subject to a shorter process. The proposed Two- and Three-Step processes appear reasonable and provide sufficient notice to the providers to enable them to acknowledge and respond to the Commission's concerns.

To enhance the Commission's ability to quickly remove providers that willfully violate the rules, the State AGs also endorse adoption of a shorter, 5-day cure/response period under the Two-Step process and recommend that the Commission apply the 5-day period consistently to all notices that qualify for the Two-Step process, which covers the more serious violations.[65] Consistent application is more objective and would avoid claims that the Commission is somehow unfairly favoring some providers over others. A One-Step process should also be included in the rules to avoid unduly limiting the Commission's authority to act swiftly and effectively to stop ongoing harm to consumers caused by predatory or malicious actors.

The State AGs agree that a suspension from the RMD may also be employed to serve as a temporary remedy and an intermediate step before removal.[66] Depending on the circumstances of the violation and the level of harm associated with the call traffic involved, during a pending investigation and notice period, the Commission may determine that it would best serve the public interest immediately by suspending call traffic from a particular provider prior to its removal from the RMD. As an alternative or a complement to a One-Step removal process, suspending a

[65] *Id.* at ¶ 84.

[66] *Id.* at ¶¶ 87–91.

provider's ability to transmit call traffic would be a suitable response to situations like those mentioned above—where the Commission must act swiftly to stop ongoing harm to consumers pending the outcome of the investigation and notice period associated with the removal process.

Keeping bad actors out once they are removed from the RMD is key to successfully ridding the U.S. communications system of those individuals and entities that become voice service providers simply to abuse the system and harass and scam consumers rather than provide reliable communications services. Therefore, State AGs endorse Commission proposals implementing mechanisms that preclude bad actors from re-entering the RMD after removal.[67]

As described above, investigations have revealed several instances where bad actors re-entered the voice ecosystem after removal by creating a new business name, affiliate, successor or assuming the identity of a shelf corporation. They then use the new identity to continue to facilitate illegal robocalling and fraudulent behavior. At a minimum, the State AGs recommend that the Commission employ the same investigation and verification processes included in the "Know Your Upstream Provider" rulemaking to evaluate whether to allow individuals and entities to enter and re-enter the voice ecosystem or file RMD plans.

The State AGs also support the proposals to codify restrictions on reinstatement such as requiring that both the Wireline Competition and Enforcement Bureaus' consent prior to a removed provider's reinstatement, that the provider's filing would not appear in the RMD until the filing is accepted and published, and that the Wireline Competition and Enforcement Bureaus have the discretion to grant, deny, or condition reinstatement based on various risk factors. The State AGs agree with the risk factors in the Current Further Notice,[68] including the provider's cooperation

[67] *Id.* at ¶ 98.

[68] *Id.* at ¶ 101.

with the Bureau, the provider's compliance history, plus the Enforcement Bureau's risk assessment regarding the likelihood that the provider's network would be used to transmit illegal calls.

ii. State AGs support strengthening the filing format and content of robocall mitigation plans

The State AGs support the Commission's proposals to enhance the utility of Robocall Mitigation Plans to better serve the purpose of the rules.[69] We agree that the "reasonable steps" standard has proven too lax and that requiring providers to take "affirmative, effective measures" signals the need for providers to take meaningful, proactive steps to mitigate the use of their networks to transmit illegal traffic and to be accountable for the effectiveness of the plans they adopt.[70] While the State AGs believe that the rules already require providers to mitigate opportunities for their networks to be used to facilitate all illegal conduct, expressly broadening the type of traffic to be mitigated beyond robocalls to "illegal" calls could improve the design of the plans to better achieve the purpose of the rules to prevent the use of the networks from not only facilitating robocalls but also from perpetuating scams, fraud and other impermissible conduct.[71]

The State AGs share Commission staff's concern that providers that file Robocall Mitigation Plans with minimal information may not have implemented adequate robocall mitigation programs[72] and therefore support requirements for plans to include more detail. State AGs recommend that the Commission obligate providers to file descriptions of specific processes and procedures they have adopted to vet their retail and wholesale customers, including their KYC and KYUP policies. Providers should also describe call analytics that they employ to detect and deter

[69] *Id.* at ¶¶ 51–52.

[70] *Current Further Notice* at ¶ 53.

[71] *Id.* at ¶ 54.

[72] *Id.* at ¶ 58.

illegal traffic from their networks, including whether the analytics are developed internally or through a third party.[73] The State AGs agree that requiring providers to develop and file detailed plans will more likely ensure that providers commit to the plans and implement processes and procedures to satisfy their requirements.

The Current Further Notice seeks comment on the format that RMD information must be submitted to the Commission. The State AGs encourage the Commission to require as much information to be populated in the RMD form as possible to avoid a situation where a provider neglects to include all information required by the rules. Designing a form that does not allow the provider to submit its information unless it completes all the boxes would best accomplish this goal. Simply requiring the submission of a PDF, on the other hand, gives providers flexibility in the level of detail they provide. To the extent that the Commission continues to accept PDF forms for some of the required information, the State AGs agree that it require the PDF to be machine readable and searchable. Any cost to a provider associated with an upgraded PDF program is outweighed by the benefits of a searchable PDF to the Commission's oversight responsibilities.

iii. State AGs support mandating verifiable evidence of solvency before providers' filings are published in the RMD

The State AGs support the Commission's proposal that RMD filers provide evidence of solvency.[74] The Commission seeks input about which RMD filers should comply with such a requirement.[75] The State AGs would like to see any such requirement, if implemented, extended to all RMD filers,[76] since bad actors may be foreign or domestic corporate entities, newly added or

[73] *Id.* at ¶¶ 56–57.

[74] *Id.* at ¶¶ 70–73.

[75] *Id.* at ¶ 71.

[76] *Id.*

long-time filers in the RMD.

In implementing such a requirement, the State AGs support the Commission requiring RMD filers to provide verifiable evidence of their solvency before the Commission publishes the filing. Only then—and after completion of all other filing requirements and proper vetting—do the State AGs think that the Commission should add the filer to the RMD, thereby authorizing other providers to take its traffic.

However, the State AGs suggest that the Commission consider how it will require RMD filers to demonstrate solvency. The Commission proposes a letter of credit requirement,[77] and mentions alternatives like surety bonds.[78] A standing letter of credit requirement could work well to ensure that a financial institution has vetted an RMD filer and will guarantee the penalty for breaching the filer's obligations to the FCC. Yet, while a standing letter of credit will require an RMD filer to put up a set amount of money to their financial institution, this amount may not cover the civil penalties that the FCC could obtain for the filer's violative actions. The State AGs encourage the FCC to further consider a bonding requirement, which could require more careful assessment of the business entity's valid legal existence, given that paying out on a surety bond can cost a great deal more than the premiums the principal plays. A bonding company might consider the business entity's capitalization and other corporate formalities, as well as the filer's robocall mitigation, which would include the implementation and effectiveness of their mitigation plan,.

Regardless of the type of financial instrument, the State AGs think that requiring RMD filers to put up funds guaranteeing the validity of their filing and their robocall mitigation policies can only benefit the interests of the consumers who State AGs are charged to protect.

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[77] *Current Further Notice* at ¶ 70.

[78] *Id.* at ¶ 73.

D. **Other considerations in the Current Further Notice**

i. State AGs endorse the prioritized implementation of all proposed rules as soon as practicable

Because all voice service providers are currently required to submit a filing in the RMD *and* all downstream providers are only permitted to accept calls from those voice service providers that have filings appearing in the RMD,[79] if the common-sense enhancements described herein are adopted and implemented, the Commission's RMD is poised to become a reliable tool to law enforcement—and to industry as a whole—to assist in safeguarding the U.S. communications network, as well as consumers, against bad actors' ability to access that network and transmit illegal calls. For these reasons, expedited adoption and implementation of the proposals described in the Current Further Notice should be of paramount concern to the Commission. Accordingly, because these significant proposals necessitate that the FCC have IT systems and internal procedures and resources in place to implement and support the proposed rules, the State AGs support the effective date of these rules to be as soon as practicable and further support any feasible tiered implementation schedule that would trigger mitigation practice obligations for providers on a step-wise basis.

ii. State AGs would not oppose third-party submissions for RMD filings if voice service providers and their principals are still responsible for all filings done on their behalf

State AGs do not oppose those proposals in the Current Further Notice allowing the continued or revised practice of third-party submissions to the RMD, provided those new, revised, and/or existing practices do not otherwise alter "the obligation to properly fulfill RMD filing

[79] *Id.* at ¶ 2.

requirements remains with providers."[80] While it would, of course, be the better practice to require the additional input of contact information for any third party, or third parties, that assisted with the submission of any portions of a provider's RMD filing, what is paramount is that the provider and its principals are the entity and parties that are responsible and accountable for all information included therein.

The State AGs defer to the Commission as to whether this would be best accomplished by keeping the signing obligation for any provider's filings to that of a provider's officer, or whether that accountability and/or liability could be sustained under the Commission's rules by allowing third parties with specified relationships to the provider to sign the provider's declaration on its behalf. Regardless, it is the accuracy and completeness of the RMD filings that consistently and persistently remain the problem with the reliability and utility of the RMD.

As described in the reply comments filed in 2024 by 47 state attorneys general in support of the Commission's then-proposals to increase the reliability of the RMD filings, "too often the information submitted by providers to the RMD is clearly false or inaccurate and demonstrates contempt for the Commission's requirements and the consumers those requirements protect. . . . These deficiencies include false, incomplete, or misleading contact information, blank or inapplicable mitigation plans, and representations which are contradicted by other FCC filings or publicly available sources."[81]

Thus, as addressed above in Section II(A), the State AGs support proposals that make allowances in the rules for review and scrutiny by the Commission of the veracity and completeness of the information submitted for a provider's filing, regardless of who submits the information on

[80] *See id.* at ¶ 17.

[81] *47 State AGs 2024 RMD Reply Comments* at 2.

the provider's behalf.

iii. State AGs support additional certification requirements that would support bases for quicker removal from the RMD when contrary conduct is identified

State AGs are aware that bad actors have no compunction about declaring or affirming or "pinky-swearing" that they will undertake obligations to conform their conduct to standards regardless of whether those bad actors truly intend to do so or not. Nevertheless, with the understanding that additional and revised certification obligations would further clarify that the FCC has a "clear and direct basis to remove providers from the RMD,"[82] the State AGs support the Commission's proposals that would require voice service providers to certify each of the following: (1) "they have not submitted false, misleading, or inaccurate information to the Commission, any agent or other third party designated by the Commission or acting on behalf of the Commission pursuant to Commission rules or direction, or the Governance Authority[;]"[83] (2) "they are in compliance with all applicable Commission rules pertaining to robocalls and other illegal calls[;]"[84] and (3) "they commit to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium" and "certify to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping their network or services from being used to transmit illegal calls."[85]

[82] *See Current Further Notice* at ¶ 22.

[83] *See id.* at ¶ 21.

[84] *See id.* at ¶ 22.

[85] *See id.* at ¶ 23.

iv. State AGs oppose allowing the confidential treatment of publicly accessible information and would support the publication of a provider's use of third parties

The Commission states that "[o]ne of the primary goals of the RMD is to promote transparency about providers and their robocall mitigation practices, and so we believe that, as a baseline, information we require providers to submit in the RMD should be made available to the public."[86] The State AGs agree. However, while considering whether certain information collected from and about providers and their mitigation practices may lend itself to confidential treatment, the State AGs do not agree that any such protections should extend to "the contact and other identifying information for human principals, the business address for non-human principals, affiliates, subsidiaries, and parent companies that are not in the RMD[.]"[87]

Instead, if the FCC envisions buttressing the RMD against, for instance, "bad actor providers, and the individuals and entities behind them, from reentering the Database after removal[,]"[88] a meaningful step in that direction would be to allow law enforcement and industry to view the organizational infrastructure of all filing providers. Particularly with increasing reliance on the use of "shelf" or "aged" companies and the use of shell companies historically,[89] keeping this type of information sheltered from public view serves no legitimate need, other than to obscure bad actors' connections to other players in the ecosystem.

Additionally, contrary to the Commission's proposal,[90] the State AGs would further support the publication of a voice service provider's uses of third parties as described in the Current Further

[86] *See id.* at ¶ 62.

[87] *See id.* at ¶ 63.

[88] *Id.* at ¶ 98.

[89] *See, e.g.*, *50 State AGs KYC Reply Comments* at 11.

[90] *See Current Further Notice* at ¶ 63.

Notice.[91] State AGs endorse the Commission's supposition that such disclosures—particularly if they were public-facing, as the State AGs support or, at a minimum, accessible to state and federal law enforcement—would "incentivize providers to use reputable third parties" and "promote accountability by facilitating our ability to evaluate whether providers are engaging legitimate third parties that have adopted appropriate practices and to allow us to better identify potential causes of non-compliance when, for example, several non-compliant providers are using the same third party."[92]

v. State AGs recommend maintaining all time constraints and obligations related to the RMD until the guardrails in the Current Further Notice can be fully implemented

In November 2024, a broad bipartisan coalition of state attorneys general filed reply comments that supported requiring voice service providers to update any information submitted to the FCC's Commission Registration System ("CORES")[93] within 10 business days of any changes to that information" in order to "[h]armoniz[e] the information in CORES and the RMD."[94] According to that filing, such a requirement would "reduce confusion by improving the accuracy of information in both databases," thus "benefit[ting] both providers and law enforcement agencies

[91] *See id.* at ¶ 38 ("We propose to require that providers submit additional information in the RMD regarding their use of third parties, which we believe will enhance accountability. Specifically, we propose to require that voice service providers indicate whether or not they engage third parties for the following: (1) performing call analytics; (2) performing the technological act of signing calls to satisfy STIR/SHAKEN obligations; (3) fulfilling KYC and KYUP obligations; and (4) submitting RMD submissions to the Commission if we permit providers to use third parties for this purpose." (footnotes omitted)).

[92] *See id.*

[93] *See 47 State AGs 2024 RMD Reply Comments* at 4 n.6 ("CORES is the system the FCC uses to facilitate the assignment of FCC Registration Numbers ("FRNs") to all persons and entities seeking to do business with the FCC. 47 C.F.R. § 1.8002(a). . . . [O]btaining an FRN is a precondition to filing in the RMD—or doing any other business before the Commission[.]").

[94] *See id.* at 4–5.

that rely on the RMD to identify potential bad actors using, or attempting to use, United States communications networks for illegal purposes."[95]

Yet, in the Current Further Notice, the Commission proposes trading off the requirement that obligates providers to update their filings in the RMD within ten business days of "any change in the information" submitted, with an obligation that would require providers to recertify their filings "more frequently, such as once a quarter or every six months[.]"[96]

The State AGs understand that consideration of such a change contemplates balancing the obligations on providers with the logistical challenges that go into investigating and enforcing noncompliance with such requirement.[97] However, State AGs do not agree that this is the appropriate time to allow for a loosening of obligations that aim to keep filing requirements current.[98] Instead, State AGs urge the Commission to keep in place all obligations that serve as protections and constraints on bad actors until such time that the reinforced guardrails articulated in the Current Further Notice can be effectively implemented.[99]

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[95] *See id.* at 5.

[96] *See Current Further Notice* at ¶ 64.

[97] *See id.* ("We seek comment on ways we can modify the requirements so that providers take these obligations seriously while preventing the obligations from being overly burdensome and allowing for focused review by Commission staff.").

[98] *See, e.g.*, *47 State AGs 2024 RMD Reply Comments* at 10 n.32 (describing how, in an ongoing multistate litigation matter, "the plaintiffs attempted to serve many of the corporate defendant's upstream providers with subpoenas for records, relying on the addresses for the upstream providers listed in the RMD[,]" only to find many of those subpoenas "returned as undeliverable," with some "were delivered to people or companies who had no relationship to any voice service provider, had never heard of the upstream provider, and had been at their address for many years").

[99] *Cf. Reply Comments of Fifty-One (51) State Attorneys General*, Numbering Policies for Modern Communications, WC Dkt No. 13-97, Telephone Number Requirements for IP-Enabled Service Providers, WC Dkt No. 07-243, Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources, WC Dkt No. 20-67, Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership, IB Dkt No. 16-155 (filed Nov. 15, 2021) at 7 ("[B]ecause the need to constrain the rampant misuse of legitimate numbers must be a priority, State AGs urge the Commission to refrain

vi. State AGs support requiring providers to notify both their upstream customers and downstream providers of conduct that is the subject of FCC orders and notices

In November 2023, the State of North Carolina, on behalf of the state attorneys general Anti-Robocall Multistate Litigation Task Force, began issuing public-facing notice letters[100] to entities of concern, which have, to date, primarily been voice service providers. During the two-year period through December 2025, the Task Force issued 64 notice letters.[101]

In August 2025, the Task Force issued notice letters to 37 voice service providers that failed to comply with certain baseline mandates from the FCC that included being nonresponsive to traceback notices and/or having deficient or otherwise nonexistent filings in the RMD. With the

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from expanding its authorization process for direct access to numbers to one-way VoIP providers or other entities that use numbers until such time that the guardrails identified in the August 2021 Notice can be ordered, implemented, and effectively deployed in order to shore up the current process consistent with the proposals identified by the Commission.").

[100] *See, e.g.*, N.C. Dep't of Justice, Anti-Robocall Litigation Task Force, Warning Notices, https://ncdoj.gov/protecting-consumers/telephones-telemarketing/fighting-robocalls/warning-notices/.

[101] *See, e.g.*, N.C. Dep't of Justice, State AG Anti-Robocall Multistate Litigation Task Force, Warning Notices, *NOTICE from the Anti-Robocall Multistate Litigation Task Force Concerning Peerless Network, Inc.'s Continuing Involvement in Suspected Illegal Robocall Traffic* (issued Dec. 3, 2025), *available at* https://ncdoj.gov/wp-content/uploads/2025/12/State-AG-Task-Force-NOTICE-Letter-to-PEERLESS-Issued-12-03-2025.pdf; N.C. Dep't of Justice, State AG Anti-Robocall Multistate Litigation Task Force, Warning Notices, *NOTICE from the Anti-Robocall Multistate Litigation Task Force Concerning Belthrough's Failures to Comply with the FCC's Requirements Regarding the Robocall Mitigation Database and/or Traceback Participation* (issued Aug. 7, 2025), *available at* https://ncdoj.gov/wp-content/uploads/2025/08/State-AG-Task-Force-NOTICE-Letter-to-Belthrough-Aug-2025.pdf; N.C. Dep't of Justice, State AG Anti-Robocall Multistate Litigation Task Force, Warning Notices, *SECOND AND FINAL NOTICE LETTER from the Anti-Robocall Multistate Litigation Task Force Concerning Telcast Network, LLC's Continued Involvement in Suspected Illegal Robocall Traffic* (issued Apr. 9, 2025), *available at* https://ncdoj.gov/wp-content/uploads/2025/04/State-AG-Task-Force-2nd-NOTICE-Letter-to-TELCAST-Apr-2025.pdf; N.C. Dep't of Justice, State AG Anti-Robocall Multistate Litigation Task Force, Warning Notices, *NOTICE from the Anti-Robocall Multistate Litigation Task Force Concerning Telcast Network LLC's Continued Involvement in Suspected Illegal Robocall Traffic* (issued Nov. 3, 2023), *available at* https://ncdoj.gov/wp-content/uploads/2023/11/State-AG-Task-Force-NOTICE-Letter-to-TELCAST.pdf.

issuance of these 37 notice letters, the Task Force began the practice of issuing copies of the notices to the downstream providers that were named therein as having accepted the call traffic at issue directly from the target providers which, in the instance of the August 2025 notices, were almost 100 providers.[102] The Task Force found this to be a useful approach to prompt both awareness and action by the notice letter recipients and by the downstreams, and yielded measurable mitigation metrics.

Because "[o]ne of the primary goals of the RMD is to promote transparency about providers and their robocall mitigation practices,"[103] and because the Task Force has seen improvements in mitigation efforts by heightened visibility of the conduct highlighted in its public-facing notice letters, State AGs support the proposals that both (1) require providers subject to an FCC removal order, suspension, and/or mandatory blocking order provide notice to their customers of the same,[104] and (2) mandate downstream providers of voice service providers subject to Commission orders to provide "direct notice to customers of an upstream provider whose calls will be blocked because of a removal or mandatory blocking order."[105]

vii. State AGs support introducing the use of filing status indicators and keeping historical RMD filings accessible to the public

The RMD is designated as the sole authoritative source from which law enforcement and industry alike can identify, among other things, all voice service providers that are currently

[102] *See, e.g.*, N.C. Dep't of Justice, State AG Anti-Robocall Multistate Litigation Task Force, Warning Notices, Aug. 7, 2025 Notice Letters, *List of Downstream Providers Carrying Noticed Target Call Traffic*, https://ncdoj.gov/wp-content/uploads/2025/08/List-of-Downstreams-Providers-Carrying-Noticed-Target-Call-Traffic.pdf.

[103] *See Current Further Notice* at ¶ 62.

[104] *See id.* at ¶ 96.

[105] *See id.* at ¶ 97.

permitted to carry voice traffic into and across the U.S.[106] However, in addition to, for instance, accurately reflecting the current list of "active" providers in the RMD that are permitted to carry voice traffic, there would also be great utility to both law enforcement and industry to be able to view the historical data of the RMD for those providers that have since been removed, whether by the provider's own choice or by the Commission's. This historical information, which is currently inaccessible through the public-facing RMD, would be very useful for both law enforcement investigative and litigation purposes, and for KYC and/or KYUP due diligence efforts by providers that seek to be good stewards of the ecosystem.

For these reasons, as well as others highlighted in the Current Further Notice,[107] State AGs support the proposals that would prevent providers from being permitted to delete their own RMD filings and would, instead, keep all voice service providers' filings—whether those filings are designated as "removed," "suspended," or "active"—as viewable in the public database and have each provider's filing be denoted by a specific filing status indicator.[108]

Further, the Task Force understands that the RMD's historical data associated with providers that have been removed from the Database are only removed from public view but are still accessible to Commission staff. Accordingly, if the Commission were to adopt a filing status indicator system in accordance with the proposals in the Current Further Notice, State AGs would urge the FCC to include in the "flagged" iteration of the RMD all of the historical filings of every voice service provider that had previously submitted a filing to the RMD since it had been

[106] *See id.* at ¶ 2 ("[A]ll voice service providers are required to submit a filing in the RMD that includes critical information about their business and their robocall mitigation practices, and downstream providers are only permitted to accept calls from providers whose filings appear in the Database and have not been removed by a Commission enforcement action.").

[107] *See, e.g.*, *id.* at ¶ 65.

[108] *See id.* at ¶ 95.

established in 2021.[109]

Additionally, and in order to minimize the lift from Commission staff resources to carry forward and harmonize those historical filings with the current filings at the time the status indicators go live in the RMD, such historical filings could rely on a filing status indicator of "archived" or something analogous to indicate that a filing was removed or archived prior to the implementation of the flagging system of status indicators. Yet, regardless of the flag used, a combined and comprehensive system of active and historical providers in the RMD would allow the Commission to tout a complete and truly authoritative resource, which State AGs hope, with the implementation of the proposals in the Current Further Notice, would be on its way to being a flagship tool for both law enforcement and responsible industry members.

III. CONCLUSION

Over this summer, state attorneys general and governmental agencies, members of industry, consumer advocates, and others have had an opportunity to weigh in on the FCC's commonsense proposals regarding issues of administration and distribution of numbering resources, as well as specific and robust KYC and KYUP processes for new and renewing customers. The Current Further Notice now turns our collective attention to proposed improvements to the FCC's own Robocall Mitigation Database to do its part to attack the problem of illegal call traffic.

If successfully implemented, the proposals described herein could truly allow the RMD to serve as *the* authoritative resource for promoting transparency and accountability for providers' robocall mitigation practices. Accordingly, the State AGs endorse those measures that would allow the RMD to move closer to becoming the flagship tool envisioned by the FCC: a trustworthy

[109] *See id.* at ¶ 3.

resource of fully vetted, accurate, and complete filings that can serve as the centerpiece of both law enforcement's and industry's common fight against illegal calls.

The six co-sponsors of this letter—the Attorneys General of Colorado, Illinois, Indiana, North Carolina, Ohio, Pennsylvania—are joined by the undersigned attorneys general across the United States.

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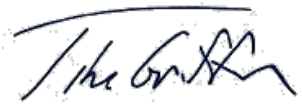
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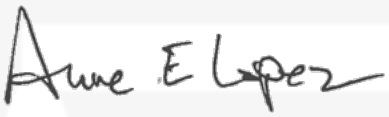
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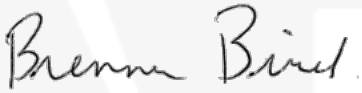
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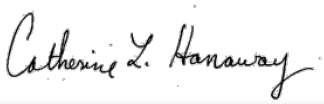
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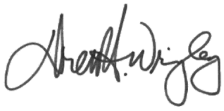
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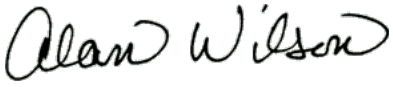
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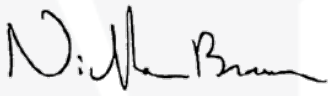
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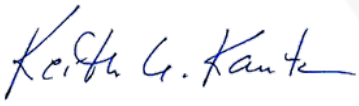
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