

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

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|---|---|----------------------|
| In the Matter of |) | |
| |) | |
| 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 |

**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, AND
FINANCIAL TECHNOLOGY ASSOCIATION TO THE NOTICE OF PROPOSED
RULEMAKING**

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June 8, 2026

The American Bankers Association (ABA), American Financial Services Association, America’s Credit Unions, Bank Policy Institute, Consumer Bankers Association, Defense Credit Union Council, Electronic Transactions Association, and Financial Technology Association (collectively, the Associations)¹ appreciate the opportunity to comment on the Federal Communications Commission’s (Commission) Notice of Proposed Rulemaking (Proposal) that would strengthen the Commission’s numbering policies to combat illegal calls.²

Fraud continues to be a pervasive problem that takes an extraordinary financial and emotional toll on consumers.³ A primary means by which bad actors perpetrate scams and other fraud is through illegal call spoofing. We appreciate that the Commission has advanced a number of proposals to combat illegal spoofing, including proposals that would impose stronger “know your customer” requirements on voice service providers that originate calls (originating providers)⁴ and on “upstream” providers that allow calls to pass through their network.⁵

Criminals evade detection when placing illegally spoofed calls in part by engaging in the numbering practices the Proposal seeks to restrict. Specifically, the Commission proposes to

¹ A description of each Association is provided in Appendix A.

² *In the Matter of Combatting Illegal Robocalls Through FCC Numbering Policies, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources, Numbering Policies for Modern Communications, Telephone Number Requirements for IP-Enabled Service Providers*, WC Docket Nos. 26-49, 20-67, 13-97, & 07-243, Notice of Proposed Rulemaking (rel. Mar. 27, 2026) [hereinafter, *Proposal*].

³ In a December 2025 report, the Federal Trade Commission estimated that 2024 fraud losses totaled a staggering \$196 billion. 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 *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).

⁵ *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-CIRC 2605-01 (rel. Apr. 29, 2026).

restrict the resale of phone numbers to a single level—i.e., to require voice service providers that obtain phone numbers from another provider to provide those numbers to end users (i.e., consumers or businesses) and not resell the numbers to another party that will provide the number to an end user.⁶ We agree with the Commission that the resale of telephone numbers can undermine transparency, accountability, and effective enforcement in the numbering ecosystem. When phone numbers are obtained, transferred, or utilized through multiple layers of intermediaries, it obfuscates which entity is placing calls from the number (i.e., which entity controls the number), which provider vetted the caller, and which actor should be held responsible for unlawful traffic.

The Commission also seeks comment on how it should address the practice of number “cycling” (or number “rotation”).⁷ Through number cycling, a caller obtains a large quantity of numbers and places calls from each number on a rotating basis—sometimes as few as one or two times—in order to avoid labeling and blocking (based on the assumption that the origination of a large volume of calls from a single number may be indicative of fraud). For example, in one analysis conducted for ABA, six million calls were placed from six million distinct telephone numbers over a six-day period between May 28, 2026 and June 3, 2026 using a single prerecorded script.⁸ Because a different number was used to place each call, recipients, many of whom received multiple calls, could not use conventional call blocking technology to stop the calls. In addition, when a criminal obtains a large quantity of phone numbers from which to place illegal calls, it impedes efforts to identify the entity responsible for the illegal calls, exhausts the limited pool of numbers that can be assigned to legitimate callers, and damages the “reputation”

⁶ *Proposal*, *supra* note 2, ¶ 48.

⁷ *Id.*, ¶ 56.

⁸ *See* App. B.

of those numbers for a future user who seeks to place lawful calls. We urge the Commission to restrict number cycling.⁹

In its discussion of number cycling, the Commission references a report published by the North American Numbering Council that states *legitimate* callers may acquire large quantities of numbers and rotate those numbers in order to avoid erroneous labeling and blocking of their outbound calls.¹⁰ Our members do not engage in these practices. To the contrary, they seek to advance their brand and deepen their relationship with consumers by using a consistent set of phone numbers from which to place calls.

We support the Commission’s continued work to combat illegal calls and urge the Commission to finalize the Proposal.

Respectfully submitted,

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⁹ A restriction on number cycling also would apply in the context of text messages, in that it would prevent criminals from obtaining a large quantity of numbers from which to place a large volume of illegal text messages to consumers (a practice known as “showshoeing”). *See In re Targeting and Eliminating Unlawful Text Messages*, Notice of Proposed Rulemaking, CG Docket No. 21-402, ¶ 6 (rel. Sept. 27, 2022) (describing snowshoeing).

¹⁰ *Proposal*, *supra* note 2, ¶ 56 & n.128.

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APPENDIX A

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.

Founded in 1916, AFSA is the primary trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including direct and indirect vehicle financing, traditional installment loans, mortgages, payment cards, and retail sales finance. AFSA members do not provide payday or vehicle title loans.

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. Eighty-seven percent 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.

APPENDIX B

The following scam report, submitted by a consumer one week ago (June 1, 2026), appears in the Better Business Bureau’s (BBB) “Scam Tracker,” which is a database of scams reported to the BBB.¹¹ Thousands of similar reports were submitted by consumers during the same time period describing similar incidents of number cycling.

BBB Scam Tracker

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This content is based on victim and potential victim accounts. Government agencies and legitimate business names and phone numbers are often used by scam artists to take advantage of people.

Description


Tom Johnson calls me daily, leaving voicemails about a personal loan (which I have not inquired about). He tells me to call 877-578-1736, however I can tell he has called from several different numbers such as 518-406-1889, 270-815-7214, 715-542-6715, 469-908-9831. Not sure if this is a call center that keeps calling me but I do not know how to stop them from harassing me. I delete, block and report spam but again the caller ID does not match the toll free number.


Targeted Person's Location


Franklin, TN, USA - 37064

Scammer Information

 TN

 Unknown Email

 (877) 578-1736

 Unknown URL

Scam Type

Advance Fee Loan

[Learn More](#)

Business name

American Expedite Loan

Date Reported

June 1, 2026

Scam ID

1308373

ABA engaged a consultant to investigate this BBB report and identify call details and audio evidence tied to this scam. In an analysis conducted for ABA, an estimated six million calls were placed over a six-day period (which occurred between May 28, 2026 to June 3, 2026)

¹¹ Better Business Bureau, *BBB Scam Tracker*, <https://www.bbb.org/scamtracker/lookupscam> (last visited Jun. 8, 2026).

that followed the scam described above, using the following script. All the calls provided the same toll-free callback number.

“This is Tom Johnson with American Expedite Loan. Hi, this is Tom Johnson calling you. It looks like you were looking into a personal loan a while back, but it seems like you were not happy with the offer you received. I actually have some good news for you. I'm currently working with a few lenders that have more lenient approval guidelines, and even if your credit score is not as strong as it used to be, as long as you have steady income, I can get this loan approved for you. There is a pre-approval available for up to \$45,000, and the payment would be around \$585 per month with no prepayment penalty. If you're seeing offers significantly lower than this, there's a good chance they are not offering you a true unsecured loan option. Call me at (877) 578-1736 and I'll go over everything with you and help get this done. Again (877) 578-1736.”

Further, the analysis of this one script found:

- The analysis confirmed the use of 5,945 distinct telephone numbers to place 5,966 calls (essentially a single originating telephone number per call), each with the same audio script instructing the recipient to call back the same toll-free number.
- The analysis traced each of the 5,966 calls to the originating voice service provider, with six different providers identified as the dominant originators over the six-day period.
- The analysis indicated that approximately six million distinct telephone numbers were used to place the total estimated six million calls in six days.