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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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 Communication	)	WC Docket No. 13-97
	)	
Telephone Number Requirements for IP-Enabled Service Providers	)	WC Docket No. 07-243
	)	

**REPLY COMMENTS OF FORTY-NINE
STATE ATTORNEYS GENERAL**

I. Introduction and Background

The undersigned State Attorneys General (“State AGs”) submit these Reply Comments in response to the *Notice of Proposed Rulemaking* issued by the Federal Communications Commission (“Commission”) seeking comment on its proposals to consider changes to numbering rules and administration to further combat illegal robocalls.¹ As the Commission is aware, the State AGs have formed a 51-member

¹ See, Notice of Proposed Rulemaking, *Combatting Illegal Robocalls Through FCC Numbering Policies*, WC Docket No. 26-49, *et. al.*, March 27, 2026 (released) (“NPRM”).

collective (“Anti-Robocall Task Force”) focused on actively investigating and pursuing enforcement actions against various entities in the robocall and robotext ecosystems that are identified as responsible for significant volumes of illegal and fraudulent robocall and messaging traffic routed into and across the United States. And, like the Commission,² combatting illegal robocalls and fraud involving the communications network remains a top priority for State AGs.

The Federal Trade Commission (“FTC”) released data showing that consumers reported losing more than \$12.5 billion in 2024 to scams, including through phone calls and texts. The most commonly reported scam category was imposter scams, such as government imposter scams, losses to which increased by \$171 million—from \$618 million in 2023 to \$789 million in 2024.³ YouMail data also show that United States consumers received 4.2 billion robocalls solely in the month of April 2026, which translates to 5.8 million calls per hour and 1.6 thousand calls per second.⁴ Forty-one percent of those calls involved telemarketing or scams.⁵ These data and other similar data demonstrate that federal and state agencies and law enforcement bodies must continue to work diligently to find ways to protect our constituents against harassment and fraud enabled by the communications network.

State AGs agree with the Commission’s observation that illegal robocalls start with a telephone number and that “the wide and indirect distribution of numbering resources also partly

² See *Triennial Report on the Efficacy of the Technologies Used in the Stir/Shaken Caller ID Authentication Framework*, Prepared by the Wireline Competition Bureau and Submitted to the Senate Committee on Commerce, Science, and Transportation and House of Representatives Committee on Energy and Commerce (Dec. 19, 2025).

³ FTC, *Top Scams of 2024* (Mar. 10, 2025), available at <https://consumer.ftc.gov/consumer-alerts/2025/03/top-scams-2024>.

⁴ YouMail, *Robocall Index*, available at <https://robocallindex.com/> (last visited Jun. 4, 2026).

⁵ *Id.*

enables the robocall ecosystem.”⁶ In addition, we observed the emergence of issues with numbering practices after implementation/deployment of STIR/SHAKEN. Implementation of STIR/SHAKEN and the need for numbers to be authenticated/properly attested is, at least in part, what appears to have given rise to what we have seen as an expansive demand for, and use of, numbering resources. Bad actors have moved from merely spoofing numbers to cycling through actual or legitimately acquired telephone numbers.

These comments will address the Commission’s proposals to expand numbering certification and disclosure obligations to all entities that sell numbering resources, implement enhanced reporting and tracing of numbering resources to prevent number resellers from enabling robocalls and obstructing robocall enforcement, and implement changes to numbering administration policies that may aid in the effort to combat robocalls, including addressing the deceptive practice of number cycling. The State AGs focus on how the Commission’s rules may be modified to improve the transparency and efficiency of investigations, ensuring that those that misuse numbering resources to engage in illegal robocalling and fraud face real consequences and enforcement.

II. Expand Number Certification and Disclosure Obligations to All Service Providers

The State AGs agree with the Commission’s proposal to expand robocall certification requirements to all service providers that obtain numbers from the North American Numbering Plan Administrator (“NANPA”) and assign telephone numbers to others. These rules require an applicant for number resources to certify that it will not use the numbers “to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall,

⁶ NPRM at ¶ 1–2.

spoofing and deceptive telemarketing obligations.”⁷ They also require the applicant to certify that it “has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database (“RMD”).”⁸

The Anti-Robocall Task Force agrees with the Enforcement Bureau’s comment that most robocalling investigations involve resold numbers.⁹ The lack of transparency concerning resellers’ assignment and number use has made it more difficult and time consuming to determine the service provider ultimately responsible for allowing bad actors to access the communications network. By increasing visibility into number resale and expanding the base of providers that are accountable for their use and sale of numbers, the application of certification rules to all providers that sell numbering resources would strengthen the opposition to illegal and fraudulent robocalling. This is particularly true if the Commission were to subject the certifications to penalties of perjury.¹⁰ Accordingly, the State AGs also concur with the Commission’s proposal to include the declaration requiring the certifications to be true “under penalty of perjury pursuant to Section 1.16” of the Commission’s rules.¹¹

The NPRM proposes to define telephone number resellers as “all LECs, CMRS providers, and interconnected VoIP providers reselling or seeking to resell services that include the provisioning of geographic numbering resources other than pseudo-ANI,” and proposes to exclude

⁷ 47 C.F.R. § 52.15(g)(3)(ii)(C).

⁸ 47 C.F.R. § 52.15(g)(3)(ii)(D).

⁹ NPRM at ¶ 6.

¹⁰ NPRM at ¶ 22.

¹¹ *Id.*

Telecommunications Relay Services (“TRS”) services.¹² The Anti-Robocall Task Force has learned through its investigations that one-way outbound (also referred to as “termination”) services are most often used by bad actors to engage in illegal robocalling and other types of communications network fraud. Those services may be classified by the service provider selling the service as one-way “non-interconnected VoIP service,” which would not be captured by the proposed definition.

Similarly, as the Commission states in the NPRM, businesses exist that have developed a product whereby they sell telephone numbers on a standalone basis, without connection to a communications service.¹³ This practice, too, would not be subject to the Commission’s certification requirements under the reseller definition proposed. The State AGs, therefore, recommend that the Commission expand the proposed definition to all providers of services that sell North American Numbering Plan (“NANP”) number resources to capture these practices and require a larger pool of number resellers to be visible and accountable for their sale and use of telephone numbers.

State AGs further recommend that the Commission prohibit altogether the resale of standalone numbers that do not also have a connection to communications services, such as inbound or outbound calling or texting. The National Association of Regulatory Utility Commissioners (“NARUC”) asks the Commission to amend its rules specifically to prohibit the sale of standalone geographic numbering resources primarily because it contributes to the premature exhaust of telephone numbers.¹⁴ State AGs join in the request, not only because of its

¹² The State AGs are not aware of any reason to object to excluding TRS services from the proposed numbering certification requirements.

¹³ See NPRM at ¶ 16 n.46.

¹⁴ NARUC, *Numbering White Paper* (Feb. 10, 2026), at 13–14, available at <https://pubs.naruc.org/pub/0CFAB9E5-CC00-D558-D278-2CBA85370EB1> (“NARUC White

effect on number exhaust, but also on the grounds that the entities selling standalone numbers are presently not accountable for the use or abuse of the numbers. And if those numbers are used in illegal or fraudulent calling campaigns, the practice introduces another layer of opaqueness into any investigation. Moreover, prohibiting the sale of geographic telephone numbers untethered to a service would be consistent with the Commission’s explicit rule against the sale of toll free (800) numbers.¹⁵ Treating the sale of all types of numbering resources consistently would simplify enforcement efforts.

State AGs also agree with the Commission’s recommendation that all service providers with direct or indirect access to numbers should certify compliance with foreign ownership reporting rules.¹⁶ This includes the requirement that current and future holders of interconnected VoIP direct access authorizations comply with any foreign ownership certification requirement within 30 days of the effective date of the rule.¹⁷ The Industry Traceback Group’s (“ITG”) letter to the FCC providing 2025 traceback data states, “Historically, approximately 40 percent of tracebacks identified a non-U.S. provider in the call path. ...”¹⁸ And while the ITG further states that the figure has declined to less than 10 percent in 2025, that decline appears to be tied to “significant churn among newly identified providers.”¹⁹ The ITG explains that these data sets “raise questions about whether certain newly identified, purportedly U.S.-based voice service

Paper”).

¹⁵ 47 C.F.R. § 52.107(a)(2).

¹⁶ NPRM at ¶ 20.

¹⁷ *Id.*

¹⁸ May 1, 2026 ITG Letter to Marlene Dortch, Secretary, Federal Communications Commission, EB Docket No. 20-195, DA 26-257 at 2.

¹⁹ *Id.*

providers have meaningful U.S. operations or presence, or instead are being used to gain access to the network and obscure the source or delivery path of illegal calls.”²⁰

The Anti-Robocall Task Force has observed these same trends and recommends that the Commission extend the foreign-ownership certification requirement to all service providers that assign or sell telephone numbers. Knowing the true identity and country of origin of those that use North American numbers to harass or otherwise abuse United States citizens would frustrate the ability of foreign-based organization to hide behind shell or shelf corporations²¹ and thereby enable enforcement efforts to be more efficient and effective. It would also provide a method to revoke telephone numbers should an entity be associated with overseas scammers.

III. Implement Enhanced Reporting and Tracing of the Use of Numbers by Resellers to Prevent Them from Enabling Robocalls and Obstructing Enforcement

In addition to expanding certification requirements, the State AGs support the Commission’s expansion of current number reporting requirements to better empower robocall mitigation and enforcement.²² Both direct access providers and resellers should be required to file their own reports, including two sets of contact information, in case one is no longer with the company or is otherwise unavailable. The State AGs understand that currently, usage reports are filed primarily by service providers with direct access to numbers, and resellers do not typically file reports with NANPA identifying numbers assigned to them or to whom they assign or sell numbers.²³ Requiring all direct access providers—as well as resellers—to file their own reports

²⁰ *Id.*

²¹ A “shelf” corporation is a legally formed business entity that has not conducted any operations—it was created, filed with the state, and left dormant so it could be sold later with an established incorporation date, *see* <https://legalclarity.org/how-shelf-corporations-work-and-how-to-buy-one/>.

²² NPRM at ¶ 24.

²³ *NARUC White Paper*, *supra* note 14, at 8–9.

would enable more efficient identification of service providers or end users associated with illegal robocalling or fraudulent conduct.

State AGs also agree that resellers should be required to identify themselves as resellers and identify the provider from which they receive numbers. The Commission should additionally require resellers to identify their service categories, such as whether they sell services as a Mobile Virtual Network Operator (“MVNO”) or a non-facilities-based VoIP service provider.²⁴ This information would allow the Commission and law enforcement to better understand the nature of the traffic flow associated with the reseller’s business model – i.e., wireless, VoIP, or traditional wireline – and to trace problem calls back to their origin consistent with the call flow and resale practices unique to the business model and technology.

In addition, State AGs understand that confusion exists across the industry regarding how to apply the definitions used in the Commission’s rules regarding number use reporting.²⁵ To mitigate the confusion, State AGs recommend that all entities that sell numbers be required to attend mandatory education on how to properly use and properly report their sale and use of numbers. Each direct access provider and reseller should also be required to certify that its employees responsible for number reporting attended the mandatory training and, in turn, provide training to its workforce.

This type of educational requirement is not without precedent in Commission rules. These requirements would be consistent with the Commission’s current rules regarding compliance certification with the education requirements of the Customer Proprietary Network Information

²⁴ NPRM at ¶ 39.

²⁵ *Id.*

(“CPNI”) rules.²⁶ This would also provide the Commission with another enforcement tool and support revocation of a non-compliant service provider’s right to access the numbering database. Access to additional number resources should be withheld from providers that fail to file appropriate forms. The threat of revoking the privilege of access to numbers must be real for it to function as an incentive.

The Commission also inquires as to whether the direct access provider should bear the burden of determining the status of its intermediate numbers by obtaining the necessary information from its resellers.²⁷ The State AGs support requiring the service provider that obtains the numbers directly from NANPA to be vigilant at supervising its customers’ number assignment and use practices. The direct access provider should be able to follow the numbers that it sells or assigns to the end user to which the number is ultimately assigned. The State AGs believe that direct access providers should be able to collect this information through Know Your Customer (“KYC”) and Know Your Upstream Provider (“KYUP”) practices and enforce it through contract language. This, too, would promote visibility into the robocalling and fraud investigation process and hold all service providers that assign or sell numbers accountable for enabling bad actors to gain access to the U.S. communications system. The State AGs encourage the Commission to withhold number resources from the direct access providers that fail to comply with the Commission’s reporting rules.

The Commission can also hold service providers accountable for their inattentiveness to the ultimate use of the numbers assigned to them by auditing service providers’ number reporting

²⁶ 47 C.F.R. § 64.2009(a)–(e).

²⁷ NPRM at ¶ 34.

and use practices.²⁸ The State AGs suggest that the Commission exercise this authority by contacting entities that have been identified by State AG offices, state utility commissions, the FTC, the Department of Justice, and other federal and state agencies and the ITG as having engaged in improper use of numbering resources.

The Commission may also consider providing NANPA with the limited authority to conduct numbering audits under the Commission's supervision.²⁹ As the agency that collects the detailed information regarding number assignment and use, NANPA is most familiar with the issues related to number administration, reporting, and abuse. Permitting the agency that is closest to the problems and employs personnel with expertise regarding numbering administration to investigate compliance with Commission rules will make the best use of limited government resources to attack the problems with reporting raised in the NPRM.

The Commission proposes limiting number resale to a single level of resellers.³⁰ While the State AGs would favor this proposal because it would mitigate the difficulty associated with tracing back illegal and harassing calls and texts through multiple hops in the call flow to identify the end user, it may too broadly restrict legitimate business practices and services that consumers desire. Requiring all number resellers to file reports identifying numbers assigned to them and their assignment and usage practices should minimize concerns expressed in the NPRM regarding the lack of visibility into the entities to which the numbers are ultimately assigned. This would also require resellers to account for their number practices. The certification requirements proposed by the Commission will improve these issues as well. Consequently, if the Commission

²⁸ 47 C.F.R. § 52.15(k).

²⁹ NPRM at ¶ 41.

³⁰ NPRM at ¶ 46.

were to adopt the rules discussed in these comments, the State AGs believe that restricting the sale of numbers to one layer of resellers would not be necessary. The State AGs do not oppose revisiting this issue in the future should the new rules not curb reseller number misuse.

The Commission offers to provide State AG offices with direct access to number reports filed by service providers with NANPA. The State AGs welcome the opportunity to access additional information to aid in their investigation and enforcement efforts and thank the Commission for its proposal.

IV. Prohibit the Practice of Number Cycling

The NPRM defines number “cycling” or “rotation” as “the use of a typically large quantity of telephone numbers, each used on a rotating basis as few as one or two times, often assigned by service providers to end users on a short-term or ‘trial’ basis.”³¹ The Commission observes that, “[a]n illegal robocaller may be motivated to use number cycling as a way to evade provider and third-party analytics that flag numbers commonly used for placing robocalls, causing calls from such numbers to be blocked.”³² The Commission also notes that “[t]he practice of number cycling can be particularly nefarious because calls originating with cycled numbers can receive the highest STIR/SHAKEN level as if they were legitimate calls”³³ “Although there may be legitimate uses of number cycling, . . . misuse of number cycling is not only bad for consumers, but also detrimental to numbering resource management and conservation efforts.”³⁴

³¹ NPRM at ¶ 51.

³² *Id.*

³³ *Id.*

³⁴ *Id.*

In this number cycling discussion, the Commission cites the Anti-Robocall Task Force's experiences with bad actors using this practice to further their robocalling and fraud activities.³⁵ The State AGs confirm that they have observed a variety of unusual number uses that further illegal robocalling and other scams using the communications network, including number cycling.

Legitimate telemarketers and people who make calls for ordinary business or personal purposes typically use the same phone number or a certain limited block of numbers for each placed call. For this reason, Call Detail Records ("CDRs") for legitimate traffic usually reflect that the total number of calls is significantly greater than the total number of unique calling phone numbers used. However, CDRs for suspicious or often illegal call traffic reflect large volumes of close to a 1-1 ratio for the total number of calls to the total number of unique calling numbers.

For example, in a North Carolina AG office enforcement action against a defendant in a telemarketing case, the defendant sent more than 17.3 million calls on a single day across only one of its 18 downstream providers. Of the 4.4 million calls that were answered, the average calls-per-number was 1.08, meaning that almost every recipient received a call from a distinct calling number. In this same case, one of defendant's downstream providers routed 3.4 million calls, almost 3.2 million calls of which used a different calling number, so that each calling number was used to make only 1.07 calls. Another of defendant's downstream providers routed 11.6 million calls using 7.9 million different calling numbers, so that each calling number was used to make only 1.53 calls. An additional downstream provider routed 42.7 million calls using 23.4 million different calling numbers, so that each calling number was used to make only 1.84 calls.

A second example is from a multi-state AG telemarketing case. In that case, one of defendant's downstream providers routed 4.52 billion calls using more than 474.8 million calling

³⁵ NPRM at ¶ 52.

numbers, 72% of which were each used to make just one call. Another downstream provider routed 587.8 million calls using more than 55.5 million calling numbers, 71% of which were each used to make just one telephone call. A third of defendant's downstream providers routed 513.6 million calls using more than 78.9 million calling numbers, over 80% of which were each used to make just one or two telephone calls. These are only two of several cases brought by State AGs for telemarketing law violations where number cycling tactics were employed by a defendant.

The State AGs also have viewed several communications service provider websites that offer services enabling call cycling.³⁶ The State AGs join in recommendations to prohibit this practice and prohibit services offered by providers that promote number rotation. The NANC Call Authentication Trust Anchor (“CATA”) Working Group Report on Direct Access to Numbers by Interconnected Voice over Internet Protocol (“VoIP”) Providers³⁷ opines that “one important reason legitimate callers may acquire large quantities of telephone numbers and use number rotation dialing practices is the perception, fueled by call completion metrics, that anti-robocalling analytics are accidentally labeling and blocking their calls to their customers and that number rotation is an effective and warranted countermeasure.”³⁸ If this is true, even “legitimate” number cycling practices are used to evade call analytics developed to protect consumers against illegal robocalls and scams. Rather than continue to allow number misuse through number cycling for the purpose of protecting legitimate businesses against improper labeling and blocking, the State AGs believe that call branding solutions such as those discussed in the Commission’s Call

³⁶ NPRM at ¶ 53.

³⁷ North American Numbering Council (NANC), CATA Working Group, *Report on Direct Access to Numbers by Interconnected Voice over Internet Protocol (VoIP) Providers* (Dec. 13, 2024), available at <https://www.fcc.gov/sites/default/files/12-13-24-CATA-Direct-Access-Report.pdf>; (“*Direct Access Report*”).

³⁸ *Id.* at 12.

Branding docket³⁹ may resolve the concerns raised by businesses complaining of the improper labeling and blocking of their lawful call traffic. Number cycling to avoid call analytics aimed to stop illegal robocalls and fraud should be prohibited.

V. Adopt Rules Restricting the Use of Trial Numbers

The Commission additionally asks about the relationship between “trial” numbers and illegal or harassing call campaigns.⁴⁰ The State AGs understand trial numbers are sometimes used by customers to evaluate a service provider’s services without commitment to a long-term contract or purpose. The Anti-Robocall Task Force has observed the abuse of trial service offerings by several types of scammers, including government imposters, Amazon imposters, and bank impersonators. The *Direct Access Report* notes that some service providers place restrictions on trial numbers to minimize the potential abuse, including by limiting a trial to the use of one number; imposing caps on usage, such as limited talk minutes, message quotas or offering a small free credit balance; and limiting call duration and the number of calls that can be placed at one time to one.⁴¹ The *Report* also discusses close monitoring of trial accounts for fraudulent or suspicious activity and sets forth recommended best practices for trial accounts.⁴²

The State AGs agree that placing restrictions such as those listed in the *Report* on service providers’ trial offerings and ongoing monitoring would discourage scammers from taking advantage of these services to harm consumers. Prohibiting the sale of “free” services and requiring providers to charge a minimal fee for a consumer to evaluate their service may also

³⁹ Ninth Further Notice of Proposed Rulemaking, *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, *et. al.* (released Oct. 29, 2025).

⁴⁰ NPRM at ¶¶ 55–58.

⁴¹ *Direct Access Report*, *supra* note 37, at 18.

⁴² *Id.*

reduce the number of scammers that use trial numbers to engage in fraud campaigns. Mandating KYC and KYUP practices for trial services would minimize these abuses as well. The State AGs encourage the Commission to incorporate these restrictions into its rules.

VI. Conclusion

The State AGs agree with the Commission's observation that "bad actors cannot commence illegal robocall activities without access to numbering resources" and "the bar to obtain resources may be too low."⁴³ Imposing certification requirements and reporting obligations on all direct access providers and all number resellers as proposed by the Commission in this NPRM should raise the bar and assist the Commission to guard against numbering resource abuse conducted to further illegal robocalling and fraud. Prohibiting the practice of number cycling and placing restrictions on the offering of trial numbers and trial services would also inhibit the use of numbers to deceive and otherwise harm consumers.

Thank you for the opportunity to provide input on these critical consumer protections.

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⁴³ NPRM at ¶ 68.



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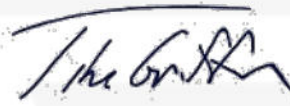
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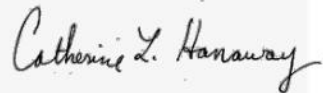
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