From: Jim <jjjtoday@proton.me>
Sent: Wednesday, May 20, 2026 11:27 AM
To: PRA <PRA@fcc.gov>; Nicole Ongele <Nicole.Ongele@fcc.gov>
Subject: [EXTERNAL]: Comment Opposing Additional Duplicative KYC Burdens — OMB Control No. 3060-0298 / Part 61 Tariffs

To whom it may concern:

I submit this comment as a telecommunications provider and small business that already bears significant compliance, technology, filing, and regulatory-fee costs. I oppose the continued layering of additional "Know Your Customer" or similar identity-verification requirements unless the Commission can clearly demonstrate that the proposed burden is necessary, narrowly tailored, non-duplicative, and effective.

The industry is already subject to multiple overlapping anti-robocall and anti-fraud frameworks, including STIR/SHAKEN, Robocall Mitigation Database obligations, traceback obligations, call blocking and analytics requirements, and industry messaging compliance programs such as 10DLC registration. Each new layer imposes real costs on legitimate providers while bad actors often move to weaker entry points, foreign-originated traffic, spoofing tactics, or non-compliant networks.

The FCC's own recent materials recognize that STIR/SHAKEN remains effective for its core purpose. In the Commission's December 2025 triennial report, the Bureau found that "the technology used in the STIR/SHAKEN framework continues to be effective at authenticating caller ID information," and record evidence showed that implementation has helped advance anti-spoofing and anti-robocall outcomes, including significant declines in FTC and FCC complaint volumes.

At the same time, the FCC has acknowledged that STIR/SHAKEN is not, and was never intended to be, a single "silver bullet" capable of eliminating all illegal robocalls. That raises the central question: if existing rules are working for their intended purposes, why is the Commission continuing to add new compliance burdens on lawful carriers rather than focusing enforcement on the specific bad actors, weak points, gateway providers, and foreign-originated traffic that remain the actual source of illegal robocall activity?

The April 2026 FCC STIR/SHAKEN proposal states that the Commission seeks to improve KYUP requirements, raise attestation standards, and close STIR/SHAKEN loopholes. If that is the objective, the Commission should focus on measurable loopholes and bad-actor enforcement rather than broad new identity-verification obligations that may burden legitimate providers and their customers without producing a measurable reduction in illegal calls.

The Paperwork Reduction Act requires the Commission to evaluate whether an information collection is necessary, whether its burden estimate is accurate, and whether the burden can be minimized. The Federal Register notice for OMB Control No. 3060-0298 states that written PRA comments are due by June 22, 2026, and identifies the collection as "Part 61, Tariffs (Other than the

Tariff Review Plan).” The current notice estimates 3,756 respondents, 4,581 responses, and response times ranging from 1 hour to 50 hours. For small and mid-sized carriers, those hours are not abstract. They translate directly into legal fees, software costs, staff time, vendor costs, and higher costs of service.

I urge the Commission to:

1. Explain specifically what existing STIR/SHAKEN, RMD, traceback, call-blocking, tariff, and industry KYC mechanisms fail to capture.
2. Quantify the incremental benefit of any new KYC-related requirement, rather than assuming that more data collection automatically improves consumer protection.
3. Exempt or reduce burdens for small providers that already comply with STIR/SHAKEN, RMD, 10DLC/messaging compliance, and existing customer due-diligence obligations.
4. Focus enforcement on providers and traffic sources shown by evidence to be enabling illegal calls.
5. Avoid creating de facto digital identity requirements for ordinary consumers or lawful businesses absent clear statutory authority, strict limits, privacy protections, and proof that less burdensome alternatives would not work.
6. Require the Commission to publish measurable success criteria before imposing any additional compliance layer.

The public wants fewer illegal robocalls. Legitimate providers want the same thing. But imposing one new compliance layer after another on lawful carriers does not necessarily stop bad actors. It may simply increase costs, reduce competition, and push smaller providers out of the market while sophisticated illegal callers adapt.

For these reasons, I oppose additional duplicative KYC or identity-verification burdens unless the Commission first demonstrates necessity, proportionality, measurable effectiveness, and a clear plan to minimize the burden on compliant providers.

Respectfully submitted,

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