

ALERT

# FCC Enforcement Action Removes Over 1,200 Providers from Robocall Mitigation Database

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August 27, 2025

On August 25, 2025, the Federal Communications Commission's (FCC) Enforcement Bureau took a significant step in its campaign against illegal robocalls, removing over 1,200 voice service providers' certifications from its Robocall Mitigation Database (RMD), effective immediately. Under the FCC's rules, voice service providers can only accept traffic from providers listed in the RMD – as a result, a voice service provider removed from the RMD is effectively disconnected from the U.S. phone network.

The Order removing these providers from the RMD (*Final Removal Order*) is a significant step forward in the Commission's enforcement efforts to tackle illegal robocalls. In a statement released with the *Final Removal Order*, Chairman Brendan Carr emphasized the FCC's continuing efforts: "Providers that fail to do their duty when it comes to stopping these calls have no place in our networks. We're taking action and will continue to do so." Voice service providers and intermediate providers must cease accepting traffic from the providers listed in Appendix A of the *Final Removal Order* by **August 27**.

## ***Final Removal Order Represents an Escalation in RMD Filing Enforcement***

On January 25, 2024, the FCC issued a Public Notice that significantly expanded robocall mitigation regulatory obligations on all providers, including by expanding the information required in Robocall Mitigation Plans (RMPs) and RMD filings. The Public Notice set a February 26, 2024 compliance deadline for updated RMD filings and certifications. After more than 2,000 providers failed to comply with the February 2024 deadline, the Bureau issued a December 2024

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## **Practice Areas**

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Order (*Show Cause Order*) directing 2,411 providers to either cure their deficient RMD filings or provide a reason why they should not be removed from the RMD.

Earlier this month, the Bureau issued an Order (*Initial Removal Order*) removing the certifications of 185 providers who failed to update their RMD filings in accordance with the *Show Cause Order*. The *Final Removal Order* significantly expands the Bureau's removal efforts, explaining that the over 1,200 certifications were removed because (1) the providers had not submitted a RMP or the RMP submitted lacked the information required to be submitted pursuant to the February 2024 deadline; and (2) the providers' certifications lacked the information required by that same time.

#### ***Enforcement Bureau Highlights Other Bad Acts by Removed Providers***

The *Final Removal Order* also highlights that the providers identified in Appendix A of the item have transmitted suspected illegal robocall traffic as either an originating or gateway provider, and many of the providers have failed to respond to traceback requests – although these facts were not the basis for these providers' removal from the RMD. The *Final Removal Order* concludes with a reminder to all voice service providers of their RMD filing obligations, and specifically, the requirement to submit information required by the January 2024 Public Notice and to keep such information up to date.

The providers listed in Appendix A of the *Final Removal Order* may not refile in the RMD unless both the Bureau and Wireless Competition Bureau consent. Voice providers should take care to review the *Final Removal Order* to assess any impact on their operations that the removal of these providers may entail. The *Final Removal Order* and Chairman Carr's explicit warning that the FCC will continue to vigorously enforce its robocalling rules represent a significant ramp up in robocall enforcement from the FCC.

#### ***Coordinated Federal and State Enforcement Efforts Continue***

As we noted last year (see here), federal and state enforcement agencies are closely coordinating on their robocall mitigation efforts. As a case in point, on the same day the FCC issued its *Initial Removal Order* removing 185 providers from the RMD, the State AG Robocall Litigation Task Force announced the launch of "Operation Robocall Roundup," a multistate effort to crack down on robocalls across the country. As part of its operation, the Task Force sent warning letters to 37 voice providers demanding that they act now to stop illegal robocalls being routed through their networks.

The Task Force noted in its announcement that it is also working with the FCC, and references the *Initial Removal Order*, pointing out that of the 37 providers identified in Task Force initiative, seven were also identified in *Initial Removal Order*. These coordinated federal and state enforcement actions will likely continue into the future.

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Wiley has a deep and experienced robocalling bench, and our experts handle federal and state policy issues, compliance with federal and state requirements, and complex TCPA issues. The FCC's *Final Removal Order* represents a significant expansion of the agency's robocall enforcement efforts, and companies should take care to immediately vet providers in their call chain and ensure that they are compliant with the FCC's robocalling rules. For more information about compliance following the removal of these providers or compliance with the Commission's robocalling rules going forward, please contact one of the authors listed on this alert.