

ALERT

FCC Imposes New Requirements on VoIP Service Providers with Direct Access to Number Blocks, Seeks Comment on Additional Measures

December 22, 2025

On December 18, 2025, the Federal Communications Commission (FCC or Commission) approved a Third Report and Order (Order) and Further Notice of Proposed Rulemaking (FNPRM) modifying certifications required for interconnected VoIP providers that obtain direct access to numbering resources—and seeking comment on (1) the feasibility of and process for reclaiming numbering blocks from providers that have had their authorizations revoked or terminated; and (2) whether the FCC should restrict numbering authorizations to Covered List entities. On December 8, 2025, the Commission also released a Public Notice seeking comment on a Petition for Rulemaking (Petition) submitted by Somos, Inc. (Somos), which requests a modernization of the Commission’s numbering assignment, administration, and routing rules.

Together, the FNPRM and Somos Petition represent important next steps from the Commission to modernize its number administration processes—especially in light of the September 2025 expiration of the North American Numbering Council’s (NANC) charter and related oversight duties. These numbering reform efforts also support the Commission’s broader goals on robocall mitigation, public safety, and national security.

Comments and reply comments on the FNPRM will be due 30 and 60 days after Federal Register publication, respectively.

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Comments and reply comments on the Petition are due January 7, 2026 and February 6, 2026, respectively.

New Requirements for VoIP Providers with Direct Access Numbering Authorizations

In March 2023, the Commission implemented new rules requiring numbering authorization applicants to make additional certifications and disclosures related to robocall prevention, public safety, and national security. The requirements applied only to new applications submitted on or after August 8, 2024.

The Order extends these requirements to *all* holders of numbering authorizations. Therefore, existing direct access authorization holders that received their authorization *before* August 8, 2024 will be required to submit the following to the FCC:

- Certification that the authorization holder will not use the numbers obtained pursuant to the numbering authorization to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations under 47 CFR § 64.1200, 64.1604, 64.6300 *et seq.*, and 16 CFR § 310.3(b);
- Certification that the authorization holder 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 as required by 47 CFR §§ 64.6301-64.6305;
- Certification that neither the authorization holder nor any of its key personnel identified in the application are or have been subject to a Commission, law enforcement, or any regulatory agency investigation for failure to comply with any law, rule, or order, including the Commission's rules applicable to unlawful robocalls or unlawful spoofing;
- Disclosures and certifications contained in 47 CFR §§ 63.18(h)-(i), which concern equity and voting interests in the authorization holder, or a certified statement explaining why these provisions do not apply;
- Certification with accompanying evidence that the authorization holder complies with its 911 obligations under Part 9 of the Commission's rules, including Next Generation 911 requirements;
- Certification with accompanying evidence that the authorization holder complies with the Communications Assistance with Law Enforcement Act, 47 U.S.C. 1001 *et seq.*;
- Certification that the authorization holder complies with Access Stimulation rules under 47 CFR § 51.914; and
- Proof that the authorization holder has filed FCC forms 477 and 499, or a statement explaining why each such form is not applicable.

The deadline to submit these certifications and disclosures to the FCC is **30 days after publication of the Order in the Federal Register**, which has yet to occur. If an authorization holder fails to submit the updated requirements or provides insufficient or unsatisfactory responses, staff from the Wireline Competition Bureau (Bureau) may review the authorization status for potential suspension, termination, and/or revocation. The Bureau has also promised to provide further administrative guidance on the necessary filings and processes

for existing authorization holders.

Additionally, the Order emphasizes that the Commission's rules require interconnected VoIP providers that obtain direct access under the revised rules to submit an update to the Commission **within 30 days** of any change to the reportable ownership information. If information about the ownership of an authorization holder causes the Commission to question whether the authorization "still serves the public interest," the Bureau has delegated authority to direct the Numbering Administrator to suspend all pending and future requests for numbers while the Bureau investigates and/or refers the matter to other Executive Branch agencies for further review.

Request for Comment on Additional Requirements for Number Authorizations

The FNPRM seeks public comment on how the Commission can further leverage the authorization process for VoIP numbering resources to combat illegal robocalls and national security threats.

First, the Commission seeks to refresh the record on the feasibility and impacts of reclaiming numbering resources from VoIP providers with authorizations that have been revoked or terminated or that are no longer providing services due to bankruptcy or other circumstances. The Commission calls for recommendations on a potential process for reclamation and asks how the FCC can minimize disruptions to end-users.

Next, the FNPRM asks whether the Commission should restrict both prospective and existing VoIP numbering authorizations for "certain entities that may threaten national security." Examples of such entities could include those on the Commission's Covered List and those who have had international or domestic section 214 authorizations revoked on national security or law enforcement grounds.

Finally, the FNPRM asks whether the Commission should restrict and/or reevaluate VoIP numbering authorizations for interconnected VoIP providers that rely on "covered" telecom equipment in their network infrastructure. The Commission also asks whether authorization holders should be 1) required to certify the absence of "covered" equipment in their networks and 2) prohibited from providing service to entities with "covered" equipment in their networks.

Request for Comment on Numbering Assignment, Administration, and Routing Rules

In a separate, but related action, the Commission seeks comment on the Somos Petition that requests a modernization of the Commission's numbering assignment, administration, and routing rules "to facilitate the technology transition to all-IP networks." Somos proposes, among other things, that the Commission:

- Eliminate the "outdated" Local Exchange Routing Guide (LERG) and related Business Integrated Routing and Rating Database System interface, which provide technical routing information for voice service providers;
- Replace the above systems with a single Internet Protocol routing guide; and

- Consolidate the related number assignment functions split between the North American Number Plan Administrator (NANPA) and the Local Number Portability Administrator (LNPA).

Wiley is home to a deep and experienced bench of attorneys who specialize in robocall and numbering matters. Our experts routinely handle complex policy and compliance issues at the federal and state levels, including TCPA and TRACED Act matters. For more information or assistance with responding to the new FNPRM or Public Notice, please contact one of the authors listed on this alert.