

ALERT

FCC Proposes Tougher Standards for Call Labeling and Foreign-Originated Calls

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On October 28, 2025, the Federal Communications Commission (FCC) voted 3-0 to adopt a Ninth Further Notice of Proposed Rulemaking (FNPRM) in its *Advanced Methods to Target and Eliminate Unlawful Robocalls* and *Call Authentication Trust Anchor* proceedings. The FNPRM is designed to enhance the effectiveness of the FCC's existing robocall mitigation framework by imposing increased regulatory obligations on voice service providers (VSPs or providers) throughout the call chain, including originating and terminating VSPs and gateway providers.

Looking to empower consumers, the FCC specifically seeks comment on several broad proposals, including requiring: (1) terminating providers to display call-verified name information (i.e., a verified personal or business name) if a call receives a STIR/SHAKEN A-level attestation that is displayed on the subscriber's handset; (2) terminating providers to display a mark designating whether the call originates from outside of the U.S. when they know or have a reasonable basis to know the call originated from outside of the U.S.; (3) originating providers to employ "reasonable measures" to verify caller identity information; (4) gateway providers to mark calls that originate from outside of the U.S.; (5) non-gateway intermediate providers within a call path to pass unaltered caller-ID information identifying the call as having originated from outside of the U.S.; and (6) providers that use reasonable analytics to block calls to include whether a call originated from outside of the U.S. as a factor in their analytics.

Below is a brief summary of the FNPRM. Comments and reply comments on the FNPRM will be due 30 days and 60 days after Federal Register publication, respectively.

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Telecom, Media & Technology
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Proposed Requirements to Transmit Caller Identity Information

The FNPRM proposes to require terminating providers to display caller identity information (at minimum, a verified personal or business name if a call receives an A-level attestation that is displayed on the subscriber's handset). FNPRM ¶ 30. It also proposes that originating providers that transmit caller identity information employ "reasonable measures" to verify the accuracy of the information transmitted. FNPRM ¶ 43. Finally, the FNPRM also seeks comment on any requirements the FCC should adopt to securely transmit caller identity information from the originating provider to the terminating provider. FNPRM ¶ 50.

Definition of "Caller Identity Information." The FNPRM proposes to define "caller identity information" as including the caller's name, location, and "other information regarding the source or apparent source of a telephone call," which generally means information other than the originating telephone number and billing information[.] FNPRM ¶ 29.

Proposed Display Requirements for Terminating VSPs. The FNPRM proposes to require terminating providers to transmit verified caller identity information specifically when the terminating provider transmits an indication to the consumer's handset that the call received an A-level attestation. FNPRM ¶ 31. At minimum, the FNPRM proposes to require terminating VSPs to transmit a verified personal or business name. ¶ 35. The FNPRM also asks about the capability of various calling handsets to present caller identity information, and how the agency's proposals impact the use of Telecommunications Relay Services, among other things. FNPRM ¶¶ 37-42.

The FNPRM also notably asks whether indicating that a call received an A-level attestation without additional caller identity information creates opportunities for fraud, and whether adopting the FCC's proposal would cause VSPs to stop transmitting an A-level attestation to consumer handsets. FNPRM ¶ 34.

Proposed Verification Requirements for Originating VSPs. The FNPRM proposes to require that originating providers "employ reasonable measures to verify the accuracy of the information transmitted" when transmitting caller identity information. FNPRM ¶ 43. In its inquiry, the FNPRM asks what measures should be viewed as "reasonable," whether the agency should mandate the collection of certain verification information, and whether the FCC should adopt minimum standards for verifying caller identity information. FNPRM ¶ 44. In determining requirements, the FNPRM also solicits comment on how the proposed rules should account for different types of callers (business, government, nonprofit, or individuals). FNPRM ¶ 45.

In outlining this caller identity framework, the FNPRM requests comment on the difficulty of navigating certain situations where consumers use something other than a legal name. For example, the FNPRM seeks comment on how to handle multi-line accounts, including family plans, where the caller name for each individual line might be different from the subscriber's name and where verification of each name might be more difficult. FNPRM ¶ 46. The FNPRM also asks whether the FCC should allow VSPs to contractually require customers to provide accurate name information. Among other things, the FNPRM notes that there are industry standards and best practices "that could inform their deliberations[.]" FNPRM ¶ 48. The FNPRM also seeks comment on the use of these industry standards and best practices, and "whether they mitigate the need for us to adopt

requirements.” FNPRM ¶ 48.

Secure Transmission of Caller Identity Information in the Call Path. The FNPRM also seeks comment on requirements that the FCC should adopt to ensure “that caller identity information is securely transmitted from the [originating VSP] to the [terminating VSP], including whether to require the use of [Rich Call Data (RCD)] to do so.” FNPRM ¶ 50. Specifically, the FNPRM asks whether the FCC should require providers to use standards-based RCD when transmitting caller identity information, whether RCD provides a means to securely transmit caller identity information, and whether to require the use “of only one or up to all three RCD standards[.]” FNPRM ¶¶ 50-53.

Additionally, the FNPRM requests comment on potential alternative caller identity solutions, requiring VSPs to implement RCD in their IP networks for all calls, and requiring caller identity verification as a condition of an originating VSP giving an A-level attestation. FNPRM ¶¶ 56-58. The FNPRM also asks how quickly VSPs could implement RCD throughout their IP networks if the FCC does adopt an RCD implementation requirement. FNPRM ¶ 60. Moreover, the FNPRM seeks comment on what steps the FCC should take to transition networks to all-IP. FNPRM ¶ 64.

Proposed Requirements Throughout the Call Chain for Calls Originating Outside of the U.S.

The FNPRM also proposes to require VSPs throughout the call chain to implement certain measures to ensure that consumers know which calls are foreign-originated, and to prohibit spoofing of U.S. telephone numbers for calls that are foreign-originated. FNPRM ¶ 23.

FNPRM Proposes That Gateway VSPs Label Foreign-Originated Calls. The FNPRM proposes to require gateway VSPs “to mark calls that originate from outside of the [U.S.]” FNPRM ¶ 70. Regarding this proposal, the FNPRM seeks comment on the ability of gateway VSPs to determine the country of origin for a call, and on whether the FCC should establish a definition for “foreign-originated” calls. FNPRM ¶¶ 70, 72.

Proposals Would Require Non-Gateway Intermediate VSPs to Transmit Foreign Origination Designations. The FNPRM proposes to require non-gateway intermediate VSPs to transmit the foreign-originated designation to downstream VSPs. FNPRM ¶ 70. The FNPRM seeks comment on the ability of VSPs across the call path to include the country of origin with the caller identity information. FNPRM ¶ 72. Specifically for intermediate providers, the FNPRM requests comment on whether providers should be required to pass the origination identifiers (OrigID) intact downstream and for the terminating provider to accept it before displaying that the call was foreign-originated. FNPRM ¶ 73.

Proposals Would Require Terminating VSPs to Display Foreign Origination Indicators. The FNPRM proposes to require terminating VSPs to transmit to consumers’ handsets an indicator that the call originated from outside of the U.S. “when they know or have reason to know that a call originated from outside of the [U.S.]” FNPRM ¶ 70. In addressing terminating VSPs, the FNPRM asks whether VSPs have the ability to display such a designation on consumer handsets, and whether the Commission should require use of non-IP solutions to ensure transmission over non-IP networks. FNPRM ¶ 73.

FNPRM Proposes Prohibition on Number Spoofing for Foreign-Originated Calls. The FNPRM seeks comment on its proposal to prohibit spoofing of U.S. telephone numbers for foreign-originated calls. FNPRM ¶ 74. Similarly, the item asks for input on calls that originate on devices subscribed to U.S. mobile or nomadic VoIP service and are roaming outside of the U.S. FNPRM ¶ 75. The FNPRM separately seeks comment on: (1) whether the FCC should establish numbering requirements that would help enable consumers to identify foreign-originated robocalls, such as by designating an area code for foreign-originated calls; (2) how to identify the source of unlawful calls that originate from outside of the U.S.; and (3) whether the FCC should continue to permit callers to spoof a North American Numbering Plan phone number for calls that originate from outside of the U.S. for calls made by or on behalf of a caller authorized to use the spoofed number, such as an overseas call center. FNPRM ¶¶ 79, 81, 85.

Call Origination Outside of the U.S. as a Reasonable Analytics Factor for Call Blocking. The FNPRM proposes to require VSPs that use reasonable analytics to block calls to include whether a call originated from outside of the U.S. as a factor in their analytics. FNPRM ¶ 76. Furthermore, the FNPRM also asks what VSPs are already doing to protect consumers from scams or otherwise potentially unlawful calls that originate from outside of the U.S. and whether there are other actions that the Commission should take to address these calls. FNPRM ¶ 78.

Legal Authority

Lastly, the FNPRM seeks comment on the FCC's belief that the Truth in Caller ID Act, the TRACED Act, and Section 251(e) of the Communications Act provides the agency with authority to enact the proposals in the item. FNPRM ¶¶ 89-92.

Wiley has a deep and experienced TCPA/Robocalling bench that can help navigate these evolving issues. If you have questions about this FNPRM or would like to file comments in the proceeding, please contact the authors of this alert.