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# Today's Presenters

# ▶ Agenda

- ▶ FCC Regulatory Developments
- ▶ Enforcement Updates
- ▶ Q&A

# **FCC Regulatory Developments**

# 8<sup>th</sup> Report and Order - Third Party Authentication FCC 24-120; WC Docket No. 17-97; Nov. 21, 2024

## *Substance*

- 8<sup>th</sup> R&O
- Permits VSPs with STIR/SHAKEN implementation obligation to work with 3<sup>rd</sup> parties to assign attestation levels for STIR/SHAKEN
  - However, forbids 3<sup>rd</sup> parties from signing traffic.
  - Directs VSPs to obtain their own STIR/SHAKEN token and sign their own traffic, which requires obtaining an OCN and filing FCC Form 499.
  - September 18, 2025, effective date.

## *Ramifications/Outstanding Issues*

- Am I a provider obligated to deploy STIR/SHAKEN; are there any remaining exceptions?
- How do I ensure my third-party arrangements for implementing STIR/SHAKEN remain compliant?
- What, if any, repercussions may arise if I am required to file a Form 499?

# Report and Order - RMD Updates

## FCC 24-135; WC Docket No. 24-13; Dec. 30, 2024

### *Substance*

- R&O**
- Mandates updates to FCC's RMD and CORES systems.
  - Establishes \$10,000 base forfeiture for submission of inaccurate or false certification data to RMD, and \$1,000 per-day fine for failure to update RMD information.
  - Establishes filings fees for initial RMD certifications.
  - March 1 annual RMD recertification.
  - Directs WCB to explore dedicating reporting mechanism for deficient RMD filings.
  - Subject to FCC's 'Red Light' status.

### *Ramifications/Outstanding Issues*

- How do I ensure the accuracy of my RMD certifications?
- What changes warrant an update to my RMD filings?
- R&O suggests enhanced auditing of RMD filings to come from FCC and WCB in the future.

# 8th Report and Order - DNO Blocking/SIP Notification FCC 25-15; WC Docket No. 17-59; Feb. 27, 2025

## ***Substance***

### **R&O**

- Extends DNO blocking to *all* providers in the call path.
- Mandates the use of SIP code 603+ when notifying callers when calls are blocked based on analytics.
- Orders sunset of SIP codes 603, 607, and 608.
- Requires VSPs to perform necessary upgrades on their equipment to ensure that 603+ code is properly mapped.

## ***Ramifications/Outstanding Issues***

- What constitutes a “reasonable” DNO list?
- When does the 603+ requirement go into effect?
- Can VSPs still use SIP codes 603 and 607, and if so, under what circumstances?
- Does 603+ address instances of incorrect labeling?
- Is Glenn Richards thrilled with this Order?

# Notice of Proposed Rulemaking - Non-IP Call Authentication FCC 25-25; WC Docket No. 17-97; Apr. 28, 2025

## *Substance*

- NPRM**
- Sought comment on use of STIR/SHAKEN on non-IP networks.
  - Tentatively endorses three non-IP solutions in particular; In-Band Authentication, Out-of-Band Multiple STI-CPS Authentication, and Out-of-Band Agreed STI-CPS Authentication.
  - Tentatively concludes certain of these solutions are “developed and reasonably available.”
  - Proposes two-year deadline for providers using TDM to either transition to IP or implement non-IP authentication.

## *Ramifications/Outstanding Issues*

- What is the interplay between this proposal and the ongoing IP transition?
- Are these non-IP authentication solutions developed and “reasonably available?”
- Will the FCC stick to a two-year deadline to implement non-IP solutions or transition to IP?

# Public Notice - TRACED Act DA 25-763; WC Docket No. 17-97; Aug. 27, 2025

## ***Substance***

### **Public Notice**

- Seeks comment on two recurring statutory obligations under the TRACED Act.
- *First*, whether the FCC should continue to extend STIR/SHAKEN deployment obligations for:
  1. small satellite voice providers, and
  2. providers unable to obtain an OCN.
- *Second*, conduct the FCC's triennial assessment of STIR/SHAKEN framework.

## ***Ramifications/Outstanding Issues***

- Will the FCC's conclusions in its triennial review impact the integrity or viability of the current STIR/SHAKEN framework?
- Will the FCC propose any changes to the STIR/SHAKEN framework?

# Enforcement Updates

# Federal and State Enforcement Activity

## FCC

- **Dec. 2024:** RMD Delisting Show Cause Order issued to 2400+ providers.
- **Feb. 2025:** \$4.5M fine proposed against Telnyx for alleged KYC violations.
- **Aug. 2025:** Initial and Final RMD Removal Orders; almost 1,400 providers removed from the RMD.
- **Sep. 2025:** FCC issues Initial RMD Removal Order for 12 providers.

## State AG Task Force

- **Apr. 2025:** State AG Task Force issues second notice letter to 9 companies.
- **Aug. 2025:** State AG Task Force announces “Robocall Roundup”; sends warning letters to 37 voice providers.

## International

- **May. 2024:** FCC issues first ever C-CIST classification (Royal Tiger - Prince Anand).
- **Jun. 2025:** Prince Anand arrested in Mumbai India by Indian law enforcement.

# Notable Legal Developments in FCC Enforcement

## Growing Uncertainty Surrounding FCC Enforcement Authority

- **Jun. 2024:** Supreme Court issues Opinion in *SEC v. Jarkesy*.
- **Apr. 2025:** Fifth Circuit strikes down FCC Forfeiture Order citing *Jarkesy*.
- **Pending:** Similar cases involving *Jarkesy* are pending in the D.C. and Second Circuits.

## FCC Continues to Closely Scrutinize RMD Submissions

- **Dec. 2024 - Aug. 2025:** FCC delists almost 1,400 providers from RMD.
- **Ongoing:** FCC sending non-public letters to RMD registrants regarding deficient filings.

**Questions?**

# Questions?



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