
UPDATE
December 12, 2024

**FCC Orders 2,411 Companies to Cure Deficiencies in
their Robocall Mitigation Database Certifications**

Yesterday, the FCC released an [Order](#) directing 2,411 domestic voice service providers or gateway providers (“Companies”) to cure the deficiencies in their Robocall Mitigation Database (“RMD”) certifications and notify the Enforcement Bureau (“Bureau”) that the deficiencies have been cured, or explain why the Bureau should not remove the certifications from the RMD.

Under the Order, **each company must cure deficiencies in their RMD certifications within 14 calendar days of the date of publication in the Federal Register** or face removal from the RMD and widespread call blocking. Removal of a company’s certification from the RMD will require all voice service providers and intermediate providers to cease accepting calls directly from that company. If a company is removed from the RMD, it cannot refile until both the Enforcement Bureau and the Wireline Competition Bureau determine that the company has addressed and resolved the deficiencies in its RMD certification.

Summary. In 2023, the FCC adopted various amendments to the robocall mitigation and certification requirements that (i) enhanced the information requirements for RMD certifications and expanded the obligation to submit a robocall mitigation plan for new and existing filers, and (ii) required all providers to include a commitment to respond fully to traceback requests within 24 hours in their RMD certifications. Both amendments took effect on February 26, 2024, and required all existing filers to update their RMD certifications to provide the additional requirements and newly required or updated robocall mitigation plans by that same date.

Robocall Mitigation and Certification Requirements. Under the amended rules, voice service providers, gateway providers, and non-gateway intermediate providers must submit the following information in their RMD certifications.

1. Certify that all calls that originate on its network are subject to a robocall mitigation program, that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the RMD, and whether it has fully, partially, or not implemented STIR/SHAKEN on the Internet Protocol portions of its network.
2. Upload a robocall mitigation plan that describes the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program based on the role(s) it serves in the call chain.
3. Provide its business name, address, and other identifying information, including contact information for a person responsible for addressing robocall mitigation-related issues, and its principals, affiliates, subsidiaries, and parent companies.
4. Additional information: (a) the role it is playing in the call chain; (b) detailed information supporting any claimed STIR/SHAKEN implementation extension or exemption; (c) a statement whether it or any affiliated entity has been subject to a Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD

certification; and (d) the provider's commitment to respond fully to traceback requests within 24 hours.

Curing deficiencies in the RMD certifications. The Enforcement Bureau may remove deficient certifications from the RMD after providing sufficient notice and opportunity to cure. Each company may cure its deficient RMD certification and notify the Enforcement Bureau that the deficiency has been cured or explain why the Bureau should not remove the Company's certification from the RMD. A company must file its response within 14 days of the date of publication in the Federal Register. Failure to respond and correct the deficiency or provide a sufficient explanation for why a company should retain its certification in the RMD will result in the removal of the company's certification. **Removal of a Company's certification from the RMD will require all voice service providers and intermediate providers to cease accepting calls directly from that company.** If any company is removed from the RMD, it cannot refile until both the Bureau and WCB determine that the Company has addressed and resolved the deficiencies in its RMD certification.

If you have questions about Robocall Mitigation Database Certifications, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com.

Please visit our website at www.cinnamonmueller.com to learn more about our lawyers and practice. You can reach Cinnamon Mueller at (314) 462-9000. *This update is provided by the law firm of Cinnamon Mueller. The document is intended for informational purposes only as a service to clients of Cinnamon Mueller. It is not intended to provide specific legal advice or to substitute obtaining appropriate legal counsel. We encourage you to consult with counsel to address special compliance issues and for assistance in negotiating or handling any such matter referred to in the update.*