

UPDATE
September 4, 2025

APPROACHING DEADLINE:
FCC Updates Robocall Mitigation Database Requirements

Voice Service Providers Using 3rd Parties Must Update Filings By September 18, 2025

Last month, the FCC's Wireline Competition Bureau released a [Public Notice](#) announcing that the FCC's revised STIR/SHAKEN robocall mitigation database filing rules will go into effect on **September 18, 2025**.

The key takeaway for voice providers – if you use a third party (e.g., Momentum) to outsource the technological act of signing your calls, you may need to update your Robocall Mitigation Database ("RMD") certification to state that your company has not implemented the STIR/SHAKEN framework.

Background. Last November, the FCC released a Report and Order which, for the first time, provided guidance on how operators who use third parties for their voice services should approach filings in the RMD. In particular, with respect to the RMD and any company's use of a third party to authenticate calls, the FCC revised its rules to require a voice provider using a third party to:

- State in its RMD certification that the voice provider has not fully or partially implemented STIR/SHAKEN.
- Ensure that the voice provider's agreement with a third party specifies the tasks that the third party will perform on the voice provider's behalf and confirm that the voice provider will (i) make all attestation-level decisions for calls signed pursuant to the agreement, and (ii) ensure that all calls will be signed using the voice provider's certificate.

Previously, the FCC had not addressed how voice providers that use third parties should approach their RMD certification. Many voice providers have therefore asserted in their RMD certification that they are STIR/SHAKEN compliant. These providers must change their certification (and any related information in their robocall mitigation plans) to NOT STIR/SHAKEN compliant by September 18, 2025.

If you have any questions robocall mitigation programs or the certification filing requirements, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com or Bruce Beard at (314) 394-1535 or bbeard@cinnamonmueller.com.

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