

UPDATE
February 10, 2026

APPROACHING DEADLINE:

All Providers Must Recertify their Robocall Mitigation Database Filings by March 1, 2026

Recently, the FCC's Wireline Competition Bureau released two [Public Notices](#) announcing that the FCC's new requirements for Robocall Mitigation Database ("RMD") filings are now effective. Most immediately, the annual RMD recertification is now in effect. **All voice providers must recertify their RMD filings by March 1, 2026.**

Instructions for completing the annual certification requirement are available [here](#). When re-certifying their RMD filings, providers should ensure that their certifications are accurate and truthful and comply with the recent modifications adopted in the Eighth Caller ID Authentication Report and Order that became effective last September. In short, if you use a third party (e.g., Momentum) to outsource the technological act of signing your calls, you must state in your RMD certification that your company has not implemented the STIR/SHAKEN framework. At this time, the \$100 filing fee is not in effect.

Other key takeaways for voice providers:

- Reporting Mechanism for Deficient Filings: Parties can submit information regarding deficient RMD filings by emailing RMD-Reporting@fcc.gov.
- Multi-Factor Authentication: Filers must now use multi-factor authentication to access the RMD and have the option of using phishing resistant authentication.
- Information Updates: Filers must update any information in the RMD within 10 business days of any changes.
- Forfeiture Increases: Base forfeiture amounts for submitting false or inaccurate information in the RMD have been significantly increased.

If you have any questions about robocall mitigation requirements in general or the recertification filing requirements, please contact Scott Friedman at 608-469-3596 or sfriedman@cinnamonmueller.com.

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