

**Before the  
Federal Communications Commission  
Washington, D.C.**

In the Matter of	)	
	)	
Improving Customer Service and Protecting Consumers through Onshoring	)	CG Docket No. 26-52
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	
Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991	)	CG Docket No. 02-278
	)	
Empowering Broadband Consumers Through Transparency	)	CG Docket No. 22-2
	)	

**COMMENTS OF THE AMERICAN BANKERS ASSOCIATION, AMERICAN  
FINANCIAL SERVICES ASSOCIATION, AMERICA’S CREDIT UNIONS, BANK  
POLICY INSTITUTE, CONSUMER BANKERS ASSOCIATION, DEFENSE CREDIT  
UNION COUNCIL, ELECTRONIC TRANSACTIONS ASSOCIATION, FINANCIAL  
TECHNOLOGY ASSOCIATION, HOUSING POLICY COUNCIL, MORTGAGE  
BANKERS ASSOCIATION, PAYMENTS LEADERSHIP COUNCIL, AND STUDENT  
LOAN SERVICING ALLIANCE TO THE NOTICE OF PROPOSED RULEMAKING IN  
CG DOCKET NO. 26-52; TENTH FURTHER NOTICE OF PROPOSED RULEMAKING  
IN CG DOCKET NO. 17-59; FURTHER NOTICE OF PROPOSED RULEMAKING IN  
CG DOCKET NO. 02-278; AND THIRD FURTHER NOTICE OF PROPOSED  
RULEMAKING IN CG DOCKET NO. 22-2**

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## INTRODUCTION AND SUMMARY

The American Bankers Association, American Financial Services Association, America's Credit Unions, Bank Policy Institute, Consumer Bankers Association, Defense Credit Union Council, Electronic Transactions Association, Financial Technology Association, Housing Policy Council, Mortgage Bankers Association, Payments Leadership Council, and Student Loan Servicing Alliance (collectively, the Associations)<sup>1</sup> appreciate the opportunity to comment on the Federal Communications Commission's (Commission or FCC) Notice of Proposed Rulemaking (Proposal) that would impose certain requirements on the customer call centers of telecommunications companies that are located abroad.<sup>2</sup>

The Associations commend the Commission's recent, decisive actions targeting illegal call spoofing. This past April, with our support,<sup>3</sup> the Commission voted to issue a proposal that would impose stronger "know your customer" requirements on voice service providers that originate calls (originating providers).<sup>4</sup> Two weeks ago—and also with our support<sup>5</sup>—the Commission voted to issue a separate proposal that would impose stronger requirements on

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<sup>1</sup> A description of each Association is provided in the Appendix.

<sup>2</sup> See *In the Matter of Improving Customer Service and Protecting Consumers through Onshoring, Advanced Methods to Target and Eliminate Unlawful Robocalls, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, and *Empowering Broadband Consumers Through Transparency*, Notice of Proposed Rulemaking in CG Docket No. 26-52, Tenth Further Notice of Proposed Rulemaking in CG Docket No. 17-59, Further Notice of Proposed Rulemaking in CG Docket No. 02-278, Third Further Notice of Proposed Rulemaking in CG Docket No. 22-22 (rel. Mar. 27, 2026) [hereinafter, *Proposal*].

<sup>3</sup> See Letter from Jonathan Thessin, Am. Bankers Ass'n, to Brendan Carr, Chairman, Fed. Commc'ns Comm'n (filed Apr. 23, 2026), <https://www.fcc.gov/ecfs/document/104231850808890/1>.

<sup>4</sup> *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket Nos. 17-59 & 02-278, Further Notice of Proposed Rulemaking (May 1, 2026).

<sup>5</sup> See Letter from Jonathan Thessin, Am. Bankers Ass'n, to Brendan Carr, Chairman, Fed. Commc'ns Comm'n (filed May 13, 2026), <https://www.fcc.gov/ecfs/document/10513782525884/1>.

“upstream” providers that allow calls to pass through their network and require originating providers to establish a verified association between its customer (the caller) and the telephone number used to place the call.<sup>6</sup> The Commission also has brought enforcement actions against an originating provider that originated hundreds of millions of illegal calls<sup>7</sup> and against a “gateway” provider for transmitting illegal calls that originated abroad.<sup>8</sup>

These policy and enforcement actions will help prevent criminals from impersonating banks, credit unions, and other legitimate businesses in calls placed to consumers. Thus, the actions have a direct nexus to stopping unlawful calls, and we urge the Commission to finalize the two proposals as soon as feasible.

By contrast, the proposed new regulations will not advance the fight against fraud; therefore, we do not support it. By the Proposal, the Commission would impose on the foreign call centers of telecommunications companies an English proficiency requirement, a limit on the percentage of customer service calls that may be made from or answered at these call centers, a mandatory disclosure at the beginning of calls handled at a foreign call center, a right for the consumer to have the call transferred to a U.S.-based call center, and a prohibition on using foreign call centers to handle communications involving sensitive customer data. These requirements will not stop criminal operations’ use of illegal call spoofing to perpetrate fraud; instead, they would regulate ordinary customer service communications of legitimate businesses, including routine account-servicing and fraud-response interactions involving our members. The

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<sup>6</sup> *In the Matter of Call Authentication Trust Anchor, Advanced Methods to Target and Eliminate Unlawful Robocalls*, WC Docket No. 17-97, CG Docket No. 17-59, Further Notice of Proposed Rulemaking, (May 21, 2026).

<sup>7</sup> *See In the Matter of Belthrough LLC*, EB-TCD-24-00037445, EB Docket No. 22-174, Final Determination Order and Removal Order (rel. Mar. 12, 2026).

<sup>8</sup> *See In the Matter of Voxbeam Telecommunications Inc.*, Notice of Apparent Liability, File No.: EB-TCD-25-00038659, NAL/Acct. No.: 202632170002, FRN: 0019816354 (rel. Apr. 2, 2026).

Commission points to no evidence that imposing these requirements on the foreign-originated calls of legitimate businesses will reduce the number of illegal calls. The Commission also states that “customer service has suffered” by the use of foreign call centers,<sup>9</sup> but relies on scant evidence in support of this conclusion<sup>10</sup>—and cites no evidence that the foreign call centers of our members, which are not telecommunications providers, provide poor customer service.

Further, the Commission seeks comment on whether it has authority under the Telephone Consumer Protection Act (TCPA) and section 251(e) of the Communications Act to impose these requirements on calls placed by non-telecommunications companies from call centers located abroad. The Commission lacks this authority.

As the FCC is aware, Congress passed the TCPA in 1991 in response to the public’s outcry over abusive, automated telemarketing practices that were found to invade consumers’ privacy and threaten public safety by continually dialing emergency, hospital, and other medical phone numbers, blocking access for consumers in need of assistance. Congress found that the use of certain automated calling technologies—autodialers<sup>11</sup> and prerecorded voice messages—allowed telemarketers to place large numbers of calls to consumers’ residential and cell phone lines at negligible cost to the telemarketer, leading to an “increasing number of consumers complaints.”<sup>12</sup> In response, Congress enacted the TCPA, which imposed specific restrictions on

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<sup>9</sup> *Proposal, supra* note 2, ¶ 9.

<sup>10</sup> The Commission cites only five customer complaints in support of its conclusion that telecommunications providers provide poor customer service. *See id.*, ¶ 9, n.12 & ¶ 11 n.15.

<sup>11</sup> As defined in the TCPA, an “automatic telephone dialing system”—commonly known as an autodialer—places calls only to randomly or sequentially generated numbers. 47 U.S.C. § 227(a)(1); *see also Facebook, Inc. v. Duguid*, 141 S. Ct. 1163, 1167 (2021) (confirming that the definition of an autodialer is limited to those devices that use a random or sequential number generator to either store or produce telephone numbers to be called).

<sup>12</sup> S. Rep. No. 102-178, at 1 (1991).

autodialed and prerecorded voice calls, including a requirement that these calls may be placed only with the recipient's prior express consent.

Nothing in the TCPA or its legislative history provides support for extending the TCPA regulations to cover call centers, which existed in 1991, but were not among the issues Congress sought to address. Interpreting the statute that way would distort its purpose and stretch a consumer-protection law beyond the problem Congress set out to solve. The TCPA targets abusive calls to American consumers using a certain technology, not the location where the calls are placed or the English language skills of the caller.

Similarly, section 251(e) of the Communications Act addresses the distribution and administration of telephone numbers to ensure the assignment of numbers to consumers and businesses is done uniformly, competitively, and in the public's interest. Section 251(e) says nothing about how businesses may operate their call centers. It is not a grant of authority to regulate the foreign call centers of non-telecommunications companies.

Where Congress has intended to impose consumer protection, privacy, and data security requirements, it has done so expressly. Congress has, for example, enacted detailed statutory frameworks—such as the Gramm-Leach-Bliley Act, the Bank Secrecy Act, and the Dodd-Frank Act—that impose extensive consumer protection, privacy, and data security obligations on financial services providers, including requirements to investigate, respond to, and resolve consumer complaints. These statutory obligations regulate the quality and responsiveness of customer service interactions and obviate any need for the Commission to impose additional, nonstatutory restrictions on the location or operation of call centers. Furthermore, compliance with these requirements is enforced by comprehensive supervisory regimes administered by the federal banking agencies and the Consumer Financial Protection Bureau to ensure compliance.

We appreciate that President Trump has directed agencies to promulgate regulations that are based on “[l]awful delegations of legislative power” and the “best reading of the underlying statutory authority . . . .”<sup>13</sup> Any application of the call center requirements described above to calls under the TCPA or section 251(e) of the Communications Act would represent an unlawful assertion of authority and would not be based on the best reading of the TCPA or Communications Act. It would also run afoul of the “major questions” doctrine, which requires clear congressional authorization before an agency may “assert[] highly consequential power . . . .”<sup>14</sup> The restrictions contained in the Proposal would, in practice, prohibit virtually all calls regarding a customer’s account by bank, credit union, and other financial institution foreign call centers. Nothing in the TCPA, section 251(e) of the Communications Act, or any other statutory provision under consideration provides clear authority for the Commission to make sweeping changes to businesses’ calling operations. We urge the Commission not to advance this nontextual reading of these statutes.

## ARGUMENT

### **I. The Telephone Consumer Protection Act Does Not Give the Commission Authority to Impose Restrictions on Businesses that Use Foreign Call Centers to Place Calls that Are Restricted by the TCPA**

The Commission seeks comment on whether the Telephone Consumer Protection Act—specifically, subsections 227(c) and (d)(3)—provide authority to the Commission to impose restrictions on businesses that use foreign call centers. Both the text of the TCPA and its

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<sup>13</sup> Exec. Order No. 14,219, Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Regulatory Initiative, 90 Fed. Reg. 10,583, 10,583 (Feb. 25, 2025). Through Executive Order 14,215, President Trump also has stated that “so-called ‘independent regulatory agencies,’” which includes the Commission, are subject to “Presidential supervision and control,” including Executive Order 14,219. *See* Exec. Order No. 14,215, Ensuring Accountability for All Agencies, 90 Fed. Reg. 10,447, 10,447 (Feb. 24, 2025).

<sup>14</sup> *West Virginia v. EPA*, 597 U.S. 697, 724 (2022).

legislative history clearly answer that the Act does not provide the Commission with this authority.

The TCPA’s core provision prohibits autodialed or prerecorded or artificial voice calls without the prior express consent of the called party.<sup>15</sup> In addition, section 227(c) of the TCPA requires the Commission to prescribe methods and procedures to “protect residential telephone subscribers’ privacy rights to avoid receiving telephone solicitations to which they object.”<sup>16</sup> Section 227(d) requires the Commission to “prescribe technical and procedural standards for systems that are used to transmit any artificial or prerecorded voice message via telephone.”<sup>17</sup> None of these provisions – or any other provision in the TCPA – authorizes the regulation of calls based on the location from which the call originated or to address perceived deficiencies in the English language skills of callers.

Indeed, the legislative history of the TCPA makes clear that Congress passed the Act primarily to control the shifting of telemarketers’ advertising costs to consumers by the use of random and sequential number generators to run mass calling campaigns.<sup>18</sup> These calling campaigns also tied up emergency and public safety-related phone lines by indiscriminately calling numbers.<sup>19</sup> Thus, Congress concluded that callers’ use of certain calling equipment to

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<sup>15</sup> 47 U.S.C. § 227(b).

<sup>16</sup> *Id.*, § 227(c)(1).

<sup>17</sup> *Id.*, § 227(d)(3).

<sup>18</sup> See Telephone Consumer Protection Act of 1991, Pub. L. No. 102-243, § 2(1), 105 Stat. 2394 (2012) [hereinafter *TCPA*] (observing the “increased use of cost-effective telemarketing techniques”); H.R. Rep. No. 102-317, at 6 (1991) (observing that “rapidly decreasing telecommunications costs . . . [and] sophisticated, computer driven telemarketing tools have caused the frequency and number of unsolicited telemarketing calls [to] increase markedly”); S. Rep. No. 102-178, at 2 (1991) (observing that the “advance of technology” has made “automated phone calls more cost-effective”).

<sup>19</sup> See *TCPA* § 2(5) (observing that “[u]nrestricted telemarketing” can be a “risk to public safety” when “an emergency or medical assistance telephone line is seized . . . .”); H.R. Rep. No. 102-

place telemarketing calls to consumers, with minimal cost to the caller, harmed consumers. Congress' singular focus in the TCPA on combating abusive telemarketing calls is particularly at odds with the Commission's suggestion that the TCPA authorizes it to regulate foreign call centers, through which businesses both place *and* receive calls that are predominantly informational in nature, not telemarketing.<sup>20</sup>

As a secondary purpose, the TCPA was intended to protect the privacy of cell phone users at a time when wireless technology was nascent.<sup>21</sup> That purpose is reflected in section 227(c), quoted above, which the Commission suggests may give it authority to regulate TCPA-restricted calls that originate from call centers located abroad. But Congress made clear that the privacy interest of consumers that is protected by the TCPA is privacy against “telephone solicitations to which [consumers] object.”<sup>22</sup> By its express terms, this provision provides the Commission with authority to regulate only “telephone solicitations”—a category of calls that specifically excludes calls placed with the recipient’s “prior express invitation or permission.”<sup>23</sup> Thus, Congress expressly excluded, from the TCPA’s protection of consumers’ privacy rights, account servicing and other informational calls that may be placed from call centers located abroad.

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317, at 10 (“Telemarketers often program their systems to dial sequential blocks of telephone numbers, which have included those of emergency and public service organizations . . .”).

<sup>20</sup> See, e.g., *Pros and Cons of Outsourcing Customer Service to an Offshore Call Center*, *Business News Daily*, <https://www.businessnewsdaily.com/5333-offshore-call-center.html> (last visited Jun. 2, 2026) (describing primary purpose of call centers is to handle incoming calls).

<sup>21</sup> See H.R. Rep. No. 102-317, at 5 (stating one purpose of TCPA is “to protect residential telephone subscriber privacy rights . . .”).

<sup>22</sup> 47 U.S.C. § 227(c)(1); see also *TCPA* § 2(5) (observing that “[u]nrestricted telemarketing . . . can be an intrusive invasion of privacy . . .”); S. Rep. No. 102-178, at 2 (1991) (finding that consumers “who complain about [telemarketing] calls believe that they are a nuisance and an invasion of privacy”).

<sup>23</sup> 47 U.S.C. § 227(a)(4) (defining “telephone solicitation”).

Moreover, the Commission already addressed the concerns that motivated Congress to pass the TCPA. In 1992 and 2003, the Commission completed rulemakings that established requirements for companies, prior to placing telemarketing calls, to consult with a company-specific “do-not-call” list and a national “do-not-call” registry listing consumers who wish not to receive these calls.<sup>24</sup> Nothing in the text, structure, or history of section 227(c) suggests Congress intended for this provision to be used to regulate foreign call centers.

Additionally, the Commission asks whether section 227(d)(3) of the TCPA gives it authority to regulate foreign call centers. Section 227(d)(3) requires the Commission to “prescribe technical and procedural standards for [telephone] systems that are used to transmit any artificial or prerecorded voice message . . . .”<sup>25</sup> Congress, however, did not give the Commission expansive authority to impose *any* type of restriction on artificial or prerecorded voice calls. Instead, Congress stated that the standards for systems that transmit artificial or prerecorded voice messages must include: (1) a requirement that the caller identify itself at the outset of the call; and (2) a requirement that the caller end the call within a prescribed period of time.<sup>26</sup> Under the *expressio unius* canon, when Congress specifies certain requirements, it is reasonable to infer that requirements “not mentioned were excluded by deliberate choice, not inadvertence.”<sup>27</sup> Applying this canon, section 227(d)(3)(A) does not authorize the Commission

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<sup>24</sup> See *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Report and Order, 7 FCC Rcd. 8752, 8763–67 ¶¶ 20-24 (1992) (requiring telemarketers to maintain and honor company-specific do-not-call lists for consumers who object to receiving further telemarketing calls) [hereinafter, *1992 Report and Order*]; *id.*, Report and Order, 18 FCC Rcd. 14014, 14022–30 ¶¶ 8–22 & 25 (2003) (adopting a national do-not-call regime that aligns with and uses the same National “Do Not Call Registry” administered by the Federal Trade Commission).

<sup>25</sup> 47 U.S.C. § 227(d)(3).

<sup>26</sup> *Id.*, §§ 227(d)(3)(A) & (B).

<sup>27</sup> *Barnhart v. Peabody Coal Co.*, 537 U.S. 149, 168 (2003).

to require disclosure of a call's country of origin or any other information Congress did not specify.

The Commission fulfilled its statutory requirement to prescribe standards by issuing the 1992 final rule that imposes these restrictions on callers of prerecorded or artificial voice calls.<sup>28</sup> The Commission—then and now—has no authority to exceed Congress' section 227(d)(3) mandate and regulate foreign call centers.

## **II. The Commission Does Not Have Authority Under Section 251(e) of the Communications Act to Regulate Calls Placed to or From Call Centers Located Abroad of Non-Telecommunications Companies**

The Commission also seeks comment on whether it has authority to apply the requirements in the Proposal to providers of non-telecommunications products and services pursuant to its authority under section 251(e) of the Communications Act.<sup>29</sup> That section gives the Commission “exclusive jurisdiction over those portions of the North American Numbering Plan [NANP] that pertain to the United States.”<sup>30</sup>

Nothing in the text of this section or in the Communications Act's legislative history suggests that Congress intended, through this provision, to give the Commission authority to regulate calls based on the location where the call originated. Congress enacted section 251(e) to centralize federal control over the assignment of telephone numbers so that numbering resources would be managed uniformly, competitively, and in the public interest during the nation's transition to a competitive telecommunications market.<sup>31</sup> Thus, Congress sought to control how phone numbers were distributed. Nothing in that purpose suggests Congress meant to confer the

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<sup>28</sup> *1992 Report and Order*, *supra* note 24, ¶¶ 52-53 (codified at 47 C.F.R. § 64.1200 (b)).

<sup>29</sup> *Proposal*, *supra* note 2, ¶¶ 100-01.

<sup>30</sup> 47 U.S.C. § 251(e)(1).

<sup>31</sup> *See* S. Rep. No. 104-230, at 118 & 122 (1996); H.R. Conf. Rep. No. 104-458, at 118 & 122 (1996).

Commission with broad authority to regulate the location, staffing, or language practices of entities that place or receive calls using assigned telephone numbers. Accepting the Commission’s interpretation of section 251(e) would mean that any business that places or receives calls using NANP numbers is subject to any operational mandates the Commission chooses to attach as a condition of number usage. That is not numbering administration; it is potential regulation of any aspect of the business’ operation.

### **III. The “Major Questions” Doctrine Confirms the Commission Lacks Authority to Restrict Call Centers Located Abroad**

Application of the “major questions” canon of statutory construction underscores the conclusion that the Commission does not have authority, under the TCPA or section 251(e), to impose English language requirements or otherwise restrict calls placed to or from call centers located abroad. As the Supreme Court has long held—and affirmed as recently as 2023<sup>32</sup>—the major questions doctrine requires clear congressional authorization before an agency may claim the power to decide an issue of vast economic or political significance.<sup>33</sup> The Commission has not met that standard in its proposed regulation of non-telecommunications companies.

The Commission suggests that it may impose requirements under the TCPA or section 251(e) of the Communications Act on calls to and from foreign call centers. This would represent an extraordinary assertion of authority that has vast economic significance, without clear congressional authorization. For example, the Proposal would prohibit call center employees located abroad from placing calls to customers concerning “sensitive transactions.”<sup>34</sup> In practice, this would prohibit virtually all calls regarding a customer’s account by bank, credit union, and

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<sup>32</sup> See *Biden v. Nebraska*, 600 U.S. 477, 505-06 (2023).

<sup>33</sup> See *West Virginia v. EPA*, 597 U.S. 697, 721–24 (2022); see also *U.S. Chamber of Commerce v. CFPB*, No. 6:22-cv-00381 (E.D. Tex. Sept. 8, 2023) (applying *West Virginia v. EPA* to strike down Consumer Financial Protection Bureau’s revisions to its examination manual).

<sup>34</sup> *Proposal*, *supra* note 2, ¶ 51.

other financial institution foreign call centers—a prohibition that would have vast economic significance. It would directly affect how financial institutions deploy staff to handle the millions of customer service calls that an institution may place and receive each year.

The other requirements in the Proposal—including an English proficiency requirement on call center employees located abroad and a cap on the number of these employees a company may employ—also represent significant assertions of authority over the methods non-telecommunications companies may use to communicate with their customers. As described above, the text and legislative history of the TCPA and section 251(e) of the Communications Act provide no support for this assertion of authority.

The major questions doctrine is clear: agencies cannot “assert[] highly consequential power beyond what Congress could reasonably have understood to have granted” to the agency.<sup>35</sup> Instead, the Commission “must point to ‘clear congressional authorization’ for the power it claims” to effectively prohibit financial institutions from placing account-related call to their customers from customer service representatives located abroad.<sup>36</sup> The Commission has not identified clear congressional authorization for the regulations it suggests it could impose on non-telecommunications providers.

Moreover, “[w]hen an agency has no comparative expertise in making certain policy judgments, . . . Congress presumably would not task it with doing so.”<sup>37</sup> The Commission is an expert agency in communications policy. It is not a labor agency, a consumer-protection

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<sup>35</sup> *West Virginia*, 597 U.S. at 724; *see also id.* at 723 (explaining that Congress does not provide “[e]xtraordinary grants of regulatory authority . . . through ‘modest words,’ ‘vague terms,’ or ‘subtle devices’”) (quoting *Whitman v. Am. Trucking Assns., Inc.*, 531 U.S. 457, 468 (2001)) (internal alteration omitted).

<sup>36</sup> *West Virginia*, 597 U.S. at 723 (quoting *Utility Air Regulatory Group v. EPA*, 573 U.S. 302, 324 (2014)).

<sup>37</sup> *West Virginia*, 597 U.S. at 729 (internal citation and quotation omitted).

generalist, or a foreign-affairs authority. The Commission has never asserted authority to impose workforce-location mandates or labor-qualification requirements on the businesses it regulates, let alone on non-regulated businesses that merely use communications services. This absence of historical precedent is strong evidence that Congress did not give the Commission authority to do so.

Moreover, if the Commission possesses authority to dictate where non-telecommunications businesses may locate their customer-service personnel, it is difficult to identify any principled boundary on the Commission's power over the business operations of entities that use telecommunications services. Under the Commission's claimed authority, any aspect of how a business interacts with customers by telephone—such as the hiring criteria, training protocols, scripting, scheduling, and quality-assurance methods used to oversee customer service representatives—would be subject to the Commission's oversight. The major-questions doctrine is designed to prevent this type of open-ended assertion of agency power that is not directly tied to unmistakable congressional authorization.

## **CONCLUSION**

The Associations support the Commission's policy and enforcement actions targeting illegal call spoofing, and we urge the Commission to finalize its proposals that would provide stronger "know your customer" and "know your upstream provider" requirements on voice service providers. But the Proposal would not advance the Commission's anti-fraud policy agenda. Instead, it would regulate valued customer-service communications between our members—which are not telecommunications providers—and their customers. And the Commission would regulate these communications involving legitimate businesses' foreign call centers without congressional authorization to do so. We urge the Commission not to advance these aspects of the Proposal.

Respectfully submitted,

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## APPENDIX

The American Bankers Association is the voice of the nation's \$26.1 trillion banking industry, which is composed of small, regional and large banks that together employ over 2 million people, safeguard \$20.5 trillion in deposits and extend \$13.7 trillion in loans.

Founded in 1916, AFSA is the primary trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including direct and indirect vehicle financing, traditional installment loans, mortgages, payment cards, and retail sales finance. AFSA members do not provide payday or vehicle title loans.

America's Credit Unions is the national trade association for consumers' best option for financial services: credit unions. America's Credit Unions advocates for policies that allow credit unions to effectively meet the needs of their nearly 142 million members nationwide.

The Bank Policy Institute is a nonpartisan public policy, research and advocacy group that represents universal banks, regional banks, and the major foreign banks doing business in the United States. BPI produces academic research and analysis on regulatory and monetary policy topics, analyzes and comments on proposed regulations, and represents the financial services industry with respect to cybersecurity, fraud, and other information security issues.

The CBA is a member-driven trade association, and the only national financial trade group focused exclusively on retail banking—banking services geared toward consumers and small businesses. As the recognized voice on retail banking issues, CBA provides leadership, education, research, and federal representation for its members. CBA members operate in all 50 states. They include the nation's largest bank holding companies as well as regional and super-community banks. Eighty-seven percent of CBA's members are financial institutions holding more than \$10 billion in assets.

The Defense Credit Union Council (DCUC) is a national trade association and trusted resource for credit unions serving military and veteran communities. Since 1963, DCUC has championed the interests of America’s credit unions through advocacy, education, collaboration, and engagement on legislative and regulatory matters that affect financial readiness, access, and support for servicemembers, veterans, and their families.

The Electronic Transactions Association (ETA) is the world’s leading advocacy and trade association for the payments industry. Its members—from global incumbents to emerging fintech innovators—process approximately \$56.75 trillion annually in purchases and person-to-person payments worldwide.

The Financial Technology Association (FTA) is a network of fintech leaders shaping the future of finance. We champion the power of technology-driven financial services to catalyze innovation and advocate for modernized policies and regulations that reflect this digital transformation.

The Housing Policy Council is a trade association comprised of the leading national mortgage lenders and servicers; mortgage, hazard, and title insurers; and technology and data companies. Our interest is in the safety and soundness of the housing finance system, the equitable and consistent regulatory treatment of all market participants, and the promotion of lending practices that create sustainable homeownership opportunities in support of vibrant communities and long-term wealth building for families. For more information, visit [www.housingpolicycouncil.org](http://www.housingpolicycouncil.org).

The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry that works to ensure the continued strength of the nation’s residential

and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans.

As a CEO-led organization, the Payments Leadership Council is committed to expanding global commerce and driving inclusive growth by encouraging public policies that protect consumers, foster inclusion, and promote innovation and competition in payments.

The Student Loan Servicing Alliance (SLSA) is the nonprofit trade association that focuses exclusively on student loan servicing issues. Our membership is responsible for servicing all federal student loans and the vast majority of private loans, and our membership is a mix of companies, state agencies, non-profits and their service partners. Our servicer members and affiliate members provide the full range of student loan servicing operations, repayment support, customer service, payment processing, and claims processing for tens of millions of federal and private loan borrowers across the country.