

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

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
)	

CLOUD COMMUNICATION ALLIANCE KYC COMMENTS

The Cloud Communications Alliance (“Alliance”) submits these comments in the above-captioned proceedings regarding know-your-customer (“KYC”) standards for originating providers.¹ The Alliance strongly supports the Commission’s continuing efforts to curb illegal calls and has been in the forefront of encouraging adoption of robust KYC practices.²

Alliance’s initial comments focus on the close relationship between this proceeding and the Federal Communications Commission’s *Branded Calling FNPRM*, a relationship the *KYC FNPRM* acknowledges.³ The *Branded Calling FNPRM* is one of several interrelated pending proceedings proposing measures to further prevent fraudulent calls from reaching consumers.

¹ *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, FCC 26-27, (rel. May 1, 2026) (*KYC FNPRM*).

² Cloud Communications Alliance & Numeracle, Know Your Customer “KYC” Principles and Best Practices, 2024, available at <https://www.cloudcommunications.com/hubfs/Know%20Your%20Customer/CCA%20KYC%20Policy%202024.pdf?hsLang=en>

³ *KYC FNPRM* at ¶ 17 (citing *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor; Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Dismissal of Outdated or Otherwise Moot Robocalls Petitions*, WC Docket No. 17-97, CG Docket Nos. 25-307, 17-59, and 02-278, Ninth Further Notice of Proposed Rulemaking in CG Docket 17-59, Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97, Further Notice of Proposed Rulemaking in CG Docket No. 02-278, Public Notice in CG Docket No. 25-307, FCC 25-76 (2025) (*Call Branding FNPRM*)).

The Alliance believes that an effective, independent caller identity verification framework provides the glue that binds these proceedings and will lead to the restoration of trust in the network.

The Commission's ultimate goal should be to ensure that consumers know and trust the identity of the calling party and that only properly vetted entities should have access to the network. Consumers will benefit through the reduction in fraudulent calling and the heightened assurance that wanted and important calls get through. Businesses will benefit from higher answer rates, fewer incidences of mislabeling or erroneous blocking and greater all around efficiencies. In furtherance of these goals, the Alliance urged, in its *Branded Calling FNPRM* comments, that the Commission adopt a "robust, uniform, open, affordable and trusted" framework utilizing accredited third-party entities to verify the identity of calling parties rather than relying solely on the KYC of originating voice service providers.⁴

A number of parties have recognized the critical importance of third-party caller identity verification. In an extensive *ex parte* communication, Numeracle noted the rapidly emerging international consensus around independently verified caller identity as essential in restoring trust in the network and it outlined thoughtful core requirements for a workable framework.⁵ Both the Alliance and ACA International identified the government supervised, accredited

⁴ See Comments of Cloud Communication Alliance, CG Docket Nos. 17-59, 02-278, and 25-307, WC Docket No. 17-97, at 2 filed January, 5, 2026 (Alliance Branded Calling Comments). Given legitimate privacy concerns of some callers, the Alliance proposed that originating providers offer a trusted caller ID information authentication solution that relies on accredited third parties and standardized, secure transmission using RCD standards.

⁵ Letter from Keith Buell, General Counsel and Head of Global Public Policy, Numeracle, to Marlene Dortch, Secretary, FCC, WC Docket No. 17-97, CG Docket Nos. 17-59 & 02-278 (dated Mar. 25, 2026) (Numeracle *ex parte*).

enterprise identity framework established by the Global Legal Entity Identifier System (“GLEIS”) as a possible model.⁶

Therefore, when the Commission asks if there is “a direct connection between the customer identity information originating providers would gather if we adopt enhanced KYC requirements and the caller identity information terminating providers would deliver to handsets,” the answer is most emphatically yes.⁷ The KYC requirements proposed in this *KYC FNPRM*, such as verifying name, place of formation, physical address, and alternate phone number, are the same types of verified information required before transmitting identity information to the called party. As stated in a recent filing by Provenant, the “work product of robust KYC onboarding is, in effect, the input dataset for verified caller name and branded calling at delivery.”⁸ The key contribution that the Commission can make toward restoration of trust in the network is to set the framework for cryptographically transmitting standardized credentials that uniquely identify a verified legal entity such as those that are already “in widespread use across financial regulatory regimes in multiple jurisdictions.”⁹

In a letter to the Commission before it adopted the *KYC FNPRM*, the Alliance raised the possibility of verified identity information becoming “portable.” The Commission raised concerns about the Alliance’s proposal.¹⁰ The Alliance appreciates the discussion of this question contained in Provenant’s recent filing, which provides a more nuanced and appropriate

⁶ Alliance Branded Calling Comments at 2. *See also* Comments of ACA International, Inc., CG Docket Nos. 17-59, 02-278, and 25-307, WC Docket No. 17-97, at 11–13 filed January 5, 2026 (discussing the advantages of using the GLEIS framework). The *KYC FNPRM* asks if other industries and/or countries have adopted successful KYC verification requirements. *KYC FNPRM* at ¶ 20. The Alliance posits that the GLEIS framework is one such example.

⁷ *KYC FNPRM*, ¶ 17.

⁸ Provenant KYC Comments at 2 (filed June 17, 2026).

⁹ *Id.* (noting that “a robust, industry-developed, open-standards-based identity verification substrate exists today.”)

¹⁰ *KYC FNPRM*, n. 25.

description of what we had in mind. Rather than relying on the KYC performed by another originating provider, a business customer can present to a provider “a cryptographic artifact attesting to verified organizational identity, issued under a published governance framework” that the provider then independently verifies “against the governance framework’s verification mechanisms.”¹¹ This process achieves the goals that the Alliance intends – making verification less expensive and time consuming – while maintaining trust in the identity information presented.

The Alliance respectfully urges the Commission to develop a framework for independently verified customer identity information not just to enhance answer rates for businesses and enable consumers to know who is calling, which it will do, but to provide a gating mechanism to ensure only legitimate companies gain network access.

Respectfully Submitted,

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/s/

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¹¹ Provenant KYC Comments at 4.