

May 1, 2025

Marlene Dortch, Secretary
Federal Communications Commission
45 L St. NE
Washington, D.C. 20554

Re: Enforcement Bureau Requests Information on the Status of Private-Led Traceback Efforts of Suspected Unlawful Robocalls, EB Docket No. 20-195, DA 25-261

Dear Ms. Dortch:

The Industry Traceback Group (ITG)¹ is pleased to submit information for the Federal Communications Commission's (Commission's or FCC's) annual report to Congress on the state of private-led efforts to trace back the origin of suspected unlawful robocalls. In its fifth year as the registered consortium for private-led traceback efforts, ITG tracebacks continue to advance efforts to curb illegal calls. The chart below provides key metrics on the state of private led-efforts to trace back suspected unlawful robocalls for 2024, as compared to 2023 and all time since the launch of the ITG's Secure Traceback Portal (STP) through the end of 2024.

Status of Private-Led Traceback Efforts of Suspected Unlawful Robocalls – Key Metrics

	2023	2024	All Time
Tracebacks of Suspected Unlawful Robocalls ²	3,737	3,606	17,030
Total Providers Identified	699	714	2,158
New Providers Identified	270	275	N/A
Non-Responsive Providers ³	94	77	459
Percent of Completed Tracebacks with Caller Warned or Terminated	84%	69.9%	73% ⁴
Average Hops Per Traceback	5.9	4.9	5.6
Investigative Demands/Subpoenas Received	198	330	802

The ITG has maintained its focus on suspected unlawful robocalls while also growing focus on targeted live scam calls increasingly harming consumers. From January 1, 2024 to December 31, 2024, the ITG substantially expanded tracebacks of targeted, live calls to 1,408 tracebacks, up from 607 in 2023 and 521 in 2022.

The ITG continues to adapt to the evolving threat landscape in additional ways as well. For instance, the ITG established an informal group of ITG members to share data regarding suspected SIMboxes used in

¹ The ITG, a collaborative effort of companies across the wireline, wireless, VoIP, and cable industries actively working to trace and identify the source of illegal calls, is led by USTelecom – The Broadband Association.

² Tracebacks rely on a sample of suspected unlawful robocalls, meaning that tracebacks collectively represent the millions or billions of such calls targeting consumers.

³ For purposes of this submission, this figure includes providers that have not responded to three or more traceback requests during the relevant period.

⁴ The ITG began collecting structured data in tracebacks about originating provider action in late 2021. As such, this figure reflects data collected from that point forward.

originating fraud calls. ITG tracebacks have identified suspected SIMboxes in multiple fraud campaigns, including cable and phone impersonation, package delivery, bank, and unauthorized order scams, as well as campaigns targeting specific groups, such as Mandarin-speaking consumers. As part of the initiative, the ITG traced 800 calls to suspected SIMboxes, with the goal of working across the group to disrupt the activity and enable law enforcement identification of specific SIMbox locations.⁵

Bad actors continue to develop new tactics to evade the accountability enabled by the traceback process. The ITG has identified repeated instances of provider impersonation, including domain name squatting, likely intended to circumvent Know Your Upstream Provider safeguards and mislead potential interconnection partners. These imposter providers were especially prevalent in tracebacks of calls impersonating government agencies, utilities, and financial institutions. In parallel, the ITG has observed an increase in upstream providers asserting that they cannot locate the traced call on their networks, an emerging tactic that can obstruct traceback completion. In response, the ITG has implemented enhancements to the STP and traceback operations, placing responsibility on the provider that identified the imposter or non-cooperative entity and referring cases for enforcement where appropriate. Separately, providers responding to tracebacks increasingly report that their customers' systems or accounts were compromised and used to originate unlawful traffic, with such claims arising in approximately 7% of completed tracebacks in 2024.

Over 800 of the ITG's 5,014 total 2024 U.S. tracebacks were based on referrals from federal, state, and local law enforcement agencies. In addition to suspected unlawful robocalls and targeted scam calls, the ITG traced back swatting calls, telephony denial-of-service (TDoS) attacks, and calls spoofing public safety numbers in response to requests from these law enforcement partners.

The ITG continues to leverage STIR/SHAKEN caller ID authentication information collected from providers in tracebacks. Key findings based on the ITG's collection of such information follow:

Call Authentication Findings in Tracebacks

Number of Signing Providers	248
Tracebacks Identifying Signing Provider in Call Path	70%
Signer Same as Identified Originating Provider	55%
Tracebacks of A-Attested Calls with Signer-Originating Provider Mismatch	336
Providers Not identified in call path but Identified as Signing A-Attested Calls	9

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Private-led traceback efforts, in combination with the Commission's and its federal and state counterparts' regulatory and enforcement efforts, continue to play a key role in protecting users of the phone network from illegal calls. As the threat environment has evolved – including with the growing challenge of live scam calls – so too has the ITG's private-led traceback efforts. The ITG is also continuing to build successful cross-industry partnerships and is actively engaging with stakeholders in other

⁵ The number of tracebacks to suspected SIMboxes relative to other scam call tracebacks is not necessarily indicative of the overall proportion of SIMbox-originated calls targeting consumers. Instead, it reflects the ITG's focus on tracing such calls.

jurisdictions to support the development of traceback frameworks that will integrate into a global model. These efforts align with the fact that many illegal calls originate abroad and with the growing interest in traceback in other jurisdictions. The ITG looks forward to continued collaboration with the Commission and other government and industry stakeholders in addressing this changing threat.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Joshua M. Bercu/

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