



PUBLIC NOTICE

Federal Communications Commission
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CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU SEEKS COMMENT ON ROBOCALL SCORECARD

CG Docket No. 26-239

Comment Date: September 22, 2026
Reply Comment Date: October 2, 2026

I. INTRODUCTION

1. The Federal Communications Commission (FCC or Commission) has been taking a series of new actions to address the scourge of illegal robocalls. Indeed, combating illegal robocalls is the Commission's top consumer protection priority. Today, the Commission is attacking robocalls at every point in their life cycle, including through its Know-Your-Customer and Know-Your-Upstream-Provider requirements, call authentication requirements, call blocking, call labeling, enforcement, and consumer complaint monitoring.

2. Now, with this *Public Notice*, the Consumer and Governmental Affairs Bureau (Bureau or CGB) seeks comment on the FCC establishing and publishing a robocall mitigation scorecard (Scorecard). The Scorecard will empower consumers and encourage providers to continue to combat illegal robocalls by providing the public with an assessment of the effectiveness of voice service providers' efforts to protect consumers from illegal robocalls. The Scorecard will give consumers a valuable tool for choosing the provider that best protects customers from these calls—in effect, helping consumers at the very earliest point of the robocalls life cycle—when a consumer picks their provider.

3. In this *Public Notice*,¹ we describe our goals with the Scorecard, seek comment on how the FCC can make the Scorecard an effective tool for consumers, including which voice service providers should receive ratings and the types of information that should be included in those ratings. We emphasize that this is not a rulemaking that will result in new rules or requirements for voice service providers. Instead, the FCC will publish the Scorecard and thus empower consumers by providing them with more information about current provider practices in a digestible format. We believe the Scorecard will provide consumers with a way to compare providers' robocall mitigation efforts and incorporate marketplace incentives that protect them from those calls.

II. PURPOSE AND STRUCTURE

4. A Scorecard should help consumers understand how effectively voice service providers address robocalls on their networks, while also incentivizing providers to improve their robocall mitigation efforts. Our goal is to give consumers a simple, easy-to-understand guide on how well

¹ The Bureau issues this *Public Notice* pursuant to its delegated authority under 47 CFR § 0.141(d), (e), and (g). These provisions authorize the Bureau to collect and analyze information affecting consumers, develop and distribute materials that inform the public about Commission rules and initiatives, and conduct consumer outreach and education. The Scorecard furthers these functions by drawing on existing data to identify trends affecting consumers' experience with illegal robocalls and by serving as a public-facing tool that educates consumer about providers' robocall mitigation efforts.

providers protect consumers from illegal robocalls. We believe consumers will benefit from a Scorecard that evaluates both provider efforts and actual results in protecting them from illegal robocalls. In practice, that means moving beyond a simple administrative checklist (i.e., did the provider file the right paperwork, did they offer the right tools) and toward a composite set of metrics that reflects both operational practices and measurable outcomes, including how often legitimate calls are blocked. Collectively, these metrics would reflect whether a provider's efforts are producing real results for customers. This composite approach also lets the Scorecard work for providers and consumers simultaneously. The Scorecard will be simple enough for consumers to use and detailed enough for providers to identify areas for improvement.

5. It is worth also describing what the Scorecard *will not* be. It will not be an indication of whether providers have or have not complied with the Commission's robocall rules—that is a case-specific legal inquiry. Nor is the Scorecard comprehensive. Mitigating illegal robocalls involves actions that run across the entire life cycle of a call, and a consumer's provider does not control every stage of that life cycle. Still, we believe that the Scorecard can be a useful tool for consumers who want to reduce the number of illegal robocalls that reach them.

6. To achieve our goals, we believe the Scorecard should follow several key principles. First, the Scorecard must be easy to understand and accessible to consumers. Second, its rating criteria must be relevant, accurate, and derived from sources whose reliability limitations are clearly disclosed, without inherently disadvantaging any particular provider. Finally, there must be an iterative process to improve the Scorecard.² We seek comment on these principles.

III. PROVIDER SCOPE

7. We seek comment on which providers should receive a Scorecard rating. We propose rating only domestic voice service providers with retail customers, and not those who operate solely as wholesale or intermediate providers.³ We propose rating all types of retail providers—wireless, wireline, and VoIP providers, including those operating hybrid networks—because all of these network types are subject to illegal robocalls. At the same time, we do not believe we need to rate all such providers and instead aim to include those that collectively serve the vast majority of the retail market and seek comment on this approach including on what threshold of the market we should consider.

8. If we adopt this approach, how should we decide which providers to include? For example, should it be the largest providers based on the number of subscribers? Should we use the Commission's Form 477 data collection to select providers? Should small or regional providers be excluded from the Scorecard, or otherwise treated differently, given differences in compliance burden, traffic volume, and data availability? If so, how should we determine which providers are small or regional providers?

IV. DATA SOURCES

9. We seek comment on what sources of data we can use to inform the Scorecard. Specifically, we seek comment on what sources we can use for the metrics we choose to use, as described below.⁴ Are providers themselves a good source of such data? In some cases, are they the only source? Are there other sources, such as call analytics companies, that providers may use to help with labeling and blocking? Are there other parties that might have helpful data, including private companies or other governmental entities? Do such parties have data on all providers we would include in the Scorecard or

² We anticipate that the Scorecard will be a public-facing document that will be housed on the FCC's website and updated periodically.

³ We thus propose to exclude, for example, gateway and non-gateway intermediate providers that do not bill consumers directly.

⁴ We expect that any data we use for the Scorecard will not include personally identifiable information (PII) related to consumers; to the extent such PII exists in a data source, it would be removed before inclusion in the Scorecard.

just a portion of them? Are such data sources unbiased, i.e., do not have an interest in skewing results in favor of certain providers? Should the Commission consider how to reference or draw on existing third-party sources of such data?

10. We believe that the following data sources may be best suited for developing scoring metrics and seek comment on the utilization of these sources: Robocall Mitigation Database (RMD)⁵ filings, provider-offered consumer tools or services, provider blocking practices, FCC Consumer Complaints Center data,⁶ FCC enforcement action data, third-party or industry sources, Industry Traceback Group data,⁷ and Federal Trade Commission complaint data.⁸ Data on provider blocking practices specifically, tracked over time, may also help identify which approaches are most effective at minimizing erroneous blocking of legitimate calls while still stopping illegal robocalls, and could inform best practices across the industry.

11. For RMD filings specifically, how can the Bureau extract standardized, comparable information from filings that currently vary in format and content across providers? Are there specific elements of existing RMD filings that would lend themselves to consistent scoring without requiring a new collection? Are there other public data sources we should consider? What is the most useful data the Bureau can extract from each data source for purposes of the Scorecard? Are there issues with these data sources that the Bureau should consider when using them to develop scoring metrics? To the extent that non-governmental entities have developed their own independent scoring system for providers, should those scores be used in the Scorecard? If so, which ones? And how should the Bureau incorporate such scores?

V. METRICS

12. We seek comment on what types of metrics we should use for the Scorecard. We believe the metrics should be relevant to providers' success in protecting their customers from illegal robocalls. We plan to distinguish between two general categories of potential metrics: conduct-based metrics and outcome-based metrics.⁹

13. *Conduct-based metrics.* Examples of conduct-based metrics include: (a) provider-offered consumer tools to label or block calls; (b) provider network efforts to label or block calls; (c) provider responses to traceback requests; and (d) provider attestation of SIP calls (unless the provider is currently exempt). A variation on such metrics would be evidence that a provider has failed to make efforts required by rule, e.g., FCC or other enforcement action against providers for failing to make certain

⁵ See Robocall Mitigation Database, Federal Communications Commission, <https://www.fcc.gov/robocall-mitigation-database>.

⁶ See Consumer Complaints Center, Federal Communications Commission, <https://consumercomplaints.fcc.gov/hc/en-us>.

⁷ See Industry Traceback Group, USTelecom, <https://tracebacks.org>. Underlying data is not independently available/accessible to the public; the ITG website describes ITG's scope and operation.

⁸ See Consumer Sentinel Network Data Book, Federal Trade Commission, <https://www.ftc.gov/enforcement/consumer-sentinel-network/reports> (aggregate annual reporting; underlying Consumer Sentinel records are accessible only to law enforcement agencies).

⁹ Conduct-based metrics measure whether a provider has taken specific steps or responded to specific requests related to illegal robocall mitigation, regardless of whether doing so is shown to reduce illegal robocalls. Outcome-based metrics, by contrast, measure whether a provider's efforts actually reduce illegal robocalls reaching consumers, such as whether the number, rate, or severity of illegal robocalls consumer experience is measurably lower because of something the provider did. These categories are not mutually exclusive, and some metrics combine elements of both. As with all metrics discussed in this *Public Notice*, conduct-based metrics are intended to describe provider actions for comparative and consumer-education purposes, and are not intended to serve as, and should not be construed as, a determination of compliance or non-compliance with the Commission's rules. We offer this distinction to assist commenters in addressing the questions in this *Public Notice*.

blocking efforts or making an inaccurate filing in the Robocall Mitigation Database.

14. *Outcome-based metrics.* Examples of outcome-based metrics include: (a) consumer complaints filed with the FCC, the Federal Trade Commission, or other governmental bodies; (b) aggregated data, for example, on number or percentage of calls blocked, together with the false positive rate (the rate at which legitimate calls are mistakenly blocked) as a separate measure of blocking accuracy; (c) aggregated data, similarly compiled, on the number or percentage of illegal robocalls consumers receive; and (d) trend data showing whether the volume or rate of illegal robocalls reaching a providers' subscribers has changed over time, drawn from third-party analytics sources where available.

15. We seek comment on whether these metrics are the best indicators of how well a provider is protecting its customers. Would others be better and, if so, how? How should we weigh them relative to each other? Should the Scorecard include a mix of both quantitative and qualitative measurements? If so, how should the Scorecard create an appropriate mix? Is there an optimal number of metrics we should consider to balance having too few (which could unfairly skew scores toward certain carriers) versus too many (which could prove unwieldy)? Should we consider only those that measure efforts to protect their retail customers or also those that focus on protecting other consumers as well (e.g., responding to traceback requests that originate with other providers' customers)? How should we consider provider size when calculating scores (e.g., 100 complaints about a small company could proportionally weigh more heavily against that provider's score than the same number for a large company)?

16. How should the Scorecard incorporate outcome-based metrics that demonstrate whether actions taken by providers have measurably reduced illegal robocalls reaching consumers? Would such metrics help providers identify specific areas for improvement? How should the Scorecard disclose, for each metric, what it does and does not measure, so that consumers and providers are not misled by any individual rating? We invite comment on a composite structure that measures both provider actions and consumer outcomes, including how best to implement such an approach.

17. What are the limitations of using consumer complaint data (e.g., the mere filing of a complaint does not necessarily indicate a failure to stop an illegal call from reaching a consumer)? Is a complaint sufficient evidence that a consumer is unhappy with the robocall protection their provider is giving them? Should data from enforcement actions that remain subject to pending appeal or judicial review be used in the Scorecard? If so, how should such data be treated, as opposed to treatment of final, non-appealable determinations?

18. How should the Commission measure the accuracy of blocking tools? Consumers benefit not only from providers blocking illegal robocalls, but from providers avoiding the erroneous blocking of illegal calls. Providers have taken varying approaches to notify callers when calls are blocked, resolving disputed blocks, and providing points of contact for blocking error complaints. We seek comment on the best sources of data on erroneous blocking. We also seek comment on the best approaches to measuring the accuracy of provider call blocking and how to best incorporate such measures into our scoring methodology.

19. We seek comment on these and any other issues raised in this section. A key principle, as noted above, is that the Scorecard's rating criteria be relevant, accurate, available from sources whose reliability limitations are clearly disclosed, without inherently disadvantaging any particular provider. We seek comment on metrics that will fulfill that principle.

VI. METHODOLOGY

20. We seek comment on how the Scorecard metrics should be displayed to consumers, including whether the metrics should be presented individually or combined into a single composite score. If we pursue a composite approach, how should we combine and weigh the metrics? What challenges might arise from relying on a composite score? And how granular should we score providers? Should we classify providers by tiers, e.g. low risk, medium risk, high risk? If so, what criteria should we use to place providers in appropriate tiers? Should we use a percentage system, e.g., 96 out of 100? Or should we use numbers on a scale, e.g., 4 out of 5 or 7 out of 10? Would a letter grade, such as A through

F, be most appropriate? Should providers be placed in banded tiers, such as platinum, gold, or silver? We seek comment on the benefits and drawbacks of each approach, including how each would affect the clarity and meaning of any resulting score or grade for consumers.

21. Relatedly, should scoring reflect a provider's performance against a fixed standard, such that any provider meeting that standard could receive the same score regardless of how other providers perform? Or should scoring be relative, such scores are distributed across providers based on comparative performance? We seek comment on the benefits and drawbacks of each approach from both industry and consumers' perspective.

22. Is there another scoring system the Commission could use that would better balance providing consumers with information without serving as a definitive statement on a particular provider's role in the robocall ecosystem? Should the scoring system reflect a checklist section focusing on yes/no determinations for certain criteria with a value assigned to each and a sum to define the score? Or should the Scorecard reflect more qualitative assessments of the provider's conduct and outcomes?

23. How frequently should we update the Scorecard? What cadence would best incentivize providers to improve? What safeguards, if any, should apply before a provider's data is publicly displayed? Should a provider be accorded an opportunity to review and respond to data before publication? If a provider disputes the accuracy of data after publication, what process should be available to review and, if warranted, correct that data? Are there existing scorecard, rating, or public-data comparison models, at the Commission or other federal agencies, that offer useful lessons for this initiative? Are there models the Commission should avoid or emulate?

VII. ACCESSIBILITY AND LANGUAGE ACCESS

24. We seek comment on the extent to which the Scorecard may differ from other parts of the FCC's website such that the Scorecard's design may warrant particular accessibility considerations. A scorecard or comparative rating system may involve more than the display of static text shown elsewhere on the FCC's website. How can we therefore ensure that individuals with disabilities seeking information from the Scorecard "have access to and use of information and data that is comparable to the access to and use of information and data by such members of the public who are not individuals with disabilities"?¹⁰ Separately, should the Scorecard be available in languages other than English, consistent with the Commission's existing requirement that broadband consumer labels appear in languages in which a provider markets its services?

VIII. PROCEDURAL MATTERS

25. *Paperwork Reduction Act.* This document does not contain proposals for new or modified information collections subject to the Paperwork Reduction Act of 1995 (PRA), 44 U.S.C. §§ 3501-3521. In addition, therefore, it does not contain proposals for any new or modified information collection burden for small business concerns with fewer than 25 employees, pursuant to the Small Business Paperwork Relief Act of 2002, 44 U.S.C. § 3506(c)(4).

26. *Ex Parte Rules.* Pursuant to section 1.1200(a) of the Commission's rules, the Bureau hereby modifies the applicability of Commission's ex parte rules to treat as exempt certain non-policy discussions that Bureau staff may initiate, at the Bureau's discretion, between interested parties, including telecommunication industry companies, academic institutions and research entities, consumers and consumer advocacy organizations, for the purpose of developing this Scorecard. Designating this proceeding as permit but disclose will facilitate the development of a robust record by encouraging communications with staff that are disclosed to other parties. Exempting certain discussions will serve the public interest because it will enable Bureau staff to efficiently verify the technical feasibility and reliability of candidate data sources and metrics, without imposing a filing burden that could discourage the frank, candid, informal technical exchanges necessary to inform sound Scorecard design.

¹⁰ 29 U.S.C. § 794d(a)(1)(A)(ii).

27. Exempt discussions are limited to verifying factual and technical matters regarding data sources and metrics the Bureau is considering, including: the format and structure, and update frequency of existing data; the burden or cost associated with producing or accessing data a party already collects; the availability of independent verification or audit mechanisms for a given data source; and technical constraints on data access, such as licensing or proprietary format limitations. Consistent with the Paperwork Reduction Act, these discussions will not seek information beyond what the parties already produce or maintain in the ordinary course of business, and the Bureau will not rely upon them to establish any new collection of information.

28. This exemption will remain in effect prior to the Scorecard's release. Upon the Scorecard's release, the exemption will end, and disclosure requirements under section 1.1206 will apply to all communications in this proceeding, including the categories of discussion previously exempted under this paragraph. Persons making ex parte presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral ex parte presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the ex parte presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during ex parte meetings are deemed to be written ex parte presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written ex parte presentations and memoranda summarizing oral ex parte presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's ex parte rules.

29. *Filing Requirements.* Interested parties may file comments on or before the date indicated on the first page of this document.¹¹ Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).¹² All comments should refer to CG Docket No. 26-239. Please title comments responsive to this Notice as "Public Notice Comments—2026 Robocall Mitigation Scorecard Development."

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
 - Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. All filings must be addressed to the Secretary, Federal Communications Commission.
 - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.

¹¹ 47 CFR §§ 1.415, 1.419.

¹² See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
- Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

30. *People with Disabilities.* To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call 202-418-0530 (voice).

31. *Additional Information.* For further information regarding this Notice, please contact Michelle Branigan, Consumer Policy Division, Consumer and Governmental Affairs Bureau, at 202-418-1345 or Michelle.Branigan@fcc.gov. Individuals who use videophones and are fluent in American Sign Language may call the FCC's ASL Consumer Support Line at 844-432-2275 (videophone).

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