

October 6, 2026

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**Re: Improving the Effectiveness of the Robocall Mitigation Database, WC Docket No. 24-213;
Call Authentication Trust Anchor, WC Docket No. 17-97; Advanced Methods to Target and
Eliminate Unlawful Robocalls, CG Docket No. 17-59**

Dear Ms. Dortch:

The Independent Community Bankers of America (“ICBA”)¹ appreciates the opportunity to comment on the Federal Communications Commission’s (“FCC”) proposed rules to improve the effectiveness of the Robocall Mitigation Database (“RMD”).

Community bank customers are frequent targets of phone scams. Efforts to strengthen the RMD and prevent bad actors from carrying scam calls on the U.S. voice network would significantly benefit community banks, their customers, and the broader financial ecosystem.

Background

The RMD maintains records of voice service providers’ certifications and robocall mitigation plans. Downstream providers are allowed to accept calls only from providers who have filings in the RMD and have not been removed as a result of an FCC enforcement action. The RMD is available to view on the FCC’s website.²

The FCC’s proposed rules would strengthen filing obligations, enhance measures to keep bad actors out of the RMD, and streamline and clarify the RMD rules. The proposal seeks comment on a variety of questions that pertain to providers’ requirements, as well as whether the FCC should require those providers to obtain and submit a standby letter of credit from a bank meeting certain capital requirements.

¹ The Independent Community Bankers of America® has one mission: to create and promote an environment where community banks flourish. We power the potential of the nation’s community banks through effective advocacy, education, and innovation. As local and trusted sources of credit, America’s community banks leverage their relationship-based business model and innovative offerings to channel deposits into the neighborhoods they serve, creating jobs, fostering economic prosperity, and fueling their customers’ financial goals and dreams. For more information, visit ICBA’s website at icba.org.

² Fed. Comm’n Comm’n, *Robocall Mitigation Database*, https://fccprod.servicenowservices.com/rmd?id=rmd_welcome (last visited Oct. 6, 2026).

ICBA Response

Phone scams target all financial institution customers, including consumers and small businesses that bank with community banks. Bank impersonation scams, in particular, are a persistent problem for community banks. Scammers spoof a bank's phone number or pose as its fraud department to get customers to share account information or transfer funds.

Community banks maintain strong relationships with their customers. In testimony before the House Financial Services Committee's Subcommittee on Financial Institutions on behalf of ICBA, a community bank CEO noted that, when a fraudster impersonates a bank by phone, consumers begin to lose trust in banks.³ This is especially damaging to community banks that have worked hard to build trust into their relationships.

ICBA supports the FCC's efforts to screen new filers more closely before their filings are accepted, identify noncompliant providers sooner and remove them faster, and keep removed providers from re-entering the RMD without authorization. ICBA also supports requiring mitigation programs built on affirmative, effective measures that address all illegal calls because many impersonation scams occur on live calls that may not meet the definition of a robocall. ICBA defers to the FCC and voice service providers on specific implementation details.

If the FCC moves forward with requiring voice service providers to submit a standby letter of credit from a bank, ICBA recommends that the FCC ensure community banks can participate. Community banks' existing due diligence processes could help screen out bad actors, but issuing a standby letter of credit should remain voluntary and subject to each bank's established underwriting and risk management procedures. The rules should also make clear that a letter of credit does not make a bank responsible for a provider's conduct. The FCC should avoid eligibility requirements, such as SWIFT registration, that could exclude community banks that rely on correspondent banks for international payments. ICBA would welcome the opportunity to engage with the FCC to help inform any standards for banks issuing letters of credit.

The FCC's proposal advances an approach that community banks have advocated for several years. ICBA has long viewed telecom companies as essential partners in preventing fraud and scams. In its comment to the federal banking agencies on payment fraud, ICBA urged a broad, coordinated federal effort that includes telecommunications regulators.⁴ ICBA also joined a coalition of trade associations

³ *Fighting Fraud on the Front Lines: Challenges and Opportunities for Financial Institutions: Hearing Before the Subcomm. on Fin. Insts. of the H. Comm. on Fin. Servs.*, 119th Cong., at 8 (Mar. 5, 2026) (statement of Gay G. Dempsey, Chief Executive Officer, Bank of Lincoln County, on behalf of the Independent Community Bankers of America), <https://www.icba.org/w/icba-testimony-for-hfsc-hearing-on-fraud>; see also Letter from Am. Bankers Ass'n, Bank Pol'y Inst., Consumer Bankers Ass'n & Indep. Cmty. Bankers of Am. to Sen. Richard Blumenthal, Sen. Elizabeth Warren & Rep. Maxine Waters (Aug. 28, 2024) (regarding S. 4943/H.R. 9303, the Protecting Consumers from Payment Scams Act), <https://www.icba.org/w/joint-letter-on-protecting-consumers-from-payment-scams-act>.

⁴ Letter from Indep. Cmty. Bankers of Am. to Jonathan Gould, Comptroller of the Currency, Off. of the Comptroller of the Currency; Benjamin W. McDonough, Deputy Sec'y, Bd. of Governors of the Fed. Rsrv. Sys.; & Jennifer M. Jones, Deputy Exec. Sec'y, Fed. Deposit Ins. Corp., at 4 (Sept. 18, 2025) (responding to Request for Information on Potential Actions to Address Payments Fraud, Docket ID OCC-2025-0009, Docket No. OP-1866, RIN 3064-ZA49), <https://www.icba.org/w/icba-letter-responding-to-banking-agencies-rfi-on-payments-fraud>.

across industries in a comment on the STIR/SHAKEN framework, which supported the FCC's efforts to curb illegal robocall traffic.⁵

ICBA commends the FCC for its continued focus on illegal calls. A trusted voice network protects consumers, small businesses, and the community banks they rely on. Please do not hesitate to contact me at scott.anchin@icba.org if you would like to learn more about community banks' experience.

Sincerely,

/s/

Scott Anchin
Senior Vice President, Strategic Initiatives and Policy

⁵ Comments of the American Bankers Ass'n et al., WC Docket No. 17-97, at 1 (filed Nov. 18, 2025) (responding to *Wireline Competition Bureau Seeks Comment on Two Periodic TRACED Act Obligations Regarding STIR/SHAKEN Caller ID Authentication*, Public Notice, DA 25-763 (WCB rel. Aug. 27, 2025)), <https://www.icba.org/w/joint-letter-to-fcc-on-stir/shaken-framework>.