

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	)	
	)	
Consumer and Governmental Affairs Bureau	)	CG Docket No. 26-239
Seeks Comment on Robocall Scorecard	)	
	)	

COMMENTS OF INCOMPAS

INCOMPAS, by its undersigned counsel, hereby submits these comments in response to the Federal Communication Commission’s (“Commission”) *Public Notice* (“*Notice*”) seeking comment on establishing and publishing a robocall mitigation scorecard “that evaluates both provider efforts and actual results in protecting [consumers] from illegal robocalls.”¹

I. INTRODUCTION AND SUMMARY

INCOMPAS and its members appreciate the Commission’s continued and sustained efforts to combat illegal robocalls, and the association supports the Bureau’s goal of giving consumers better information to protect themselves from illegal and unwanted calls. A robocall mitigation scorecard that reliably and fairly reflects providers’ robocall mitigation efforts could be a valuable addition to the Commission’s existing toolkit of Know-Your-Customer and Know-Your-Upstream-Provider requirements, call authentication rules, blocking and labeling frameworks, and enforcement action.

As the agency begins this process, INCOMPAS members have identified significant operational and administrative challenges inherent to the data sources and metrics the Bureau has

¹ See *Consumer and Governmental Affairs Bureau Seeks Comment on Robocall Scorecard*, CG Docket Nos. 25-239, Public Notice, DA 26-932, 2 (rel. Sep. 2, 2026) (“*Notice*”).

proposed as the foundation for the scorecard. Chief among these, the Robocall Mitigation Database (“RMD”) was not designed to produce standardized, comparable data across providers; traceback volume and complaint counts measure administrative activity rather than the actual incidence of illegal traffic; business and enterprise services operate under contractual arrangements that make consumer-facing comparative scoring inapposite; reseller arrangements complicate attribution of responsibility for mitigation performance; and reliance on third-party call analytics risks importing those tools’ well-documented false-positive rates directly into the scorecard. INCOMPAS urges the Commission to address each of these issues before finalizing a scorecard methodology, so that the tool ultimately serves consumers accurately rather than creating a misleading or unfair basis for comparison.

II. THE RMD’S EXISTING CONTENT CANNOT SUPPORT ACCURATE COMPARATIVE SCORING

The Bureau proposes to draw on RMD filings as a principal data source for the Scorecard.² RMD filings, however, were not designed with comparability in mind. Each filing consists of an individualized narrative description of the mitigation measures a provider has adopted, tailored to that provider’s own network architecture and the specific products it offers. As a result, filings vary substantially in format, level of detail, and content from provider to provider. A provider that files a detailed, conservative description of its practices is not necessarily doing less than a provider whose filing is brief or generally worded—the RMD simply was not built to normalize these differences. Before the RMD can serve as a reliable input to a public-facing comparative tool, the Commission should consider what standardization

² Notice at para. 10.

of RMD content would be necessary to make filings genuinely comparable, and should seek comment on that threshold question separately from the metrics questions posed in the *Notice*.

III. RMD FILINGS AND TRACEBACK VOLUME MEASURE ADMINISTRATIVE ACTIVITY, NOT THE VOLUME OF ILLEGAL TRAFFIC

Even a standardized RMD would principally reflect whether a provider has satisfied its administrative filing obligations, not the actual volume of illegal robocalls transiting its network. Similarly, the volume of traceback requests a provider receives is a poor proxy for the effectiveness of its fraud controls. A provider that responds promptly, completely, and cooperatively to a high volume of traceback requests may simply be a large or well-integrated network, or a particularly responsive participant in the traceback process not a provider whose network carries more illegal traffic than others. Treating traceback volume as an outcome metric risks penalizing the very providers who cooperate most fully with tracing efforts, relative to providers who are more difficult to reach or slower to respond. The Commission should ensure that any metrics drawn from these sources are clearly labeled as measures of administrative or procedural activity, and should not be presented to consumers in a manner that implies a direct relationship to the volume of illegal calls a provider's network carries or blocks.

IV. THE COMMISSION SHOULD EXCLUDE BUSINESS AND ENTERPRISE SERVICES FROM SCORECARD METRICS

The *Notice* appropriately focuses the scorecard on retail voice service providers, on the theory that the tool will help consumers choose a provider.³ That rationale does not extend to business and enterprise services. Business customers negotiate individualized contractual arrangements, including quality-of-service commitments, that already govern the level of

³ See *Notice* at para. 7

protection and service reliability they receive—arrangements a retail-facing scorecard is neither designed to capture nor equipped to improve upon. Including enterprise traffic or enterprise-specific metrics in the scorecard would not assist the consumers the scorecard is meant to serve, while potentially skewing a provider’s overall rating based on considerations wholly unrelated to its retail robocall mitigation performance. INCOMPAS recommends that the Commission exclude business and enterprise services from any scorecard metrics or, at minimum, seek further comment on how these arrangements should be treated before including them.

V. RESELLER ARRANGEMENTS REQUIRE CAREFUL ATTRIBUTION OR EXCLUSION

Where a provider resells another carrier’s underlying network service, the wholesale provider—not the reseller—typically controls the network-level tools and practices that determine robocall mitigation performance. Assigning a reseller its own independent scorecard rating in these circumstances would not give consumers useful information; it would instead reflect the practices of a wholesale provider the consumer is not evaluating and cannot see. The most administrable solution is to exclude resellers from the scorecard altogether. If the Commission nonetheless wishes to include reseller offerings, it should first identify the underlying wholesale provider for each such offering and attribute that wholesale provider’s mitigation performance to the reseller’s listing, rather than scoring the reseller independently for practices that are outside of its control.

VI. RELIANCE ON THIRD-PARTY CALL ANALYTICS RISKS EMBEDDING FALSE POSITIVES INTO THE SCORECARD

Third-party call analytics tools play a significant role in existing labeling and blocking practices, but these tools are also well known to generate false positives, mislabeling or blocking legitimate calls as suspected robocalls. If the Commission incorporates analytics-derived metrics

into the scorecard without accounting for this limitation, it risks rewarding providers that rely on more aggressive—but less accurate—analytics tools, while penalizing providers that take a more conservative approach precisely to avoid erroneously blocking legitimate calls. It also incentivizes potentially anti-competitive behavior by third-party analytics providers to generate dependencies on their tools and increase calling costs of competitive providers. This tension runs directly counter to the Bureau’s own stated interest in measuring blocking accuracy and minimizing erroneous blocking of legitimate calls.⁴ Should the Commission proceed to incorporate analytics-based or blocking-based metrics, INCOMPAS urges the Commission to require that terminating providers and the analytics engines they rely upon publicly report, alongside any blocking or labeling score, the associated false-positive rate and the volume and resolution of mislabeling correction requests and time of correction, so that consumers and providers alike can evaluate the actual tradeoffs involved.

VII. THE COMMISSION SHOULD CONSIDER THE SCORECARD’S POTENTIAL DOWNSTREAM EFFECTS BEYOND CONSUMER CHOICE

The *Notice* frames the Scorecard as a consumer information tool rather than a compliance determination.⁵ INCOMPAS members are nonetheless concerned that a published score, once available, may be used by other industry participants, including downstream providers making traffic-acceptance or service-purchasing decisions, independent of, and potentially inconsistent with, the actual quality of the service a provider provides. A low score driven by data limitations of the kind described above could accordingly have consequences well beyond the consumer-choice purpose the Bureau intends, including the rejection of legitimate traffic. The Commission

⁴ See *Notice* at para. 18.

⁵ See *Notice* at para. 5.

should consider safeguards, such as a data-accuracy review and correction process before publication, as the *Notice* already contemplates seeking comment on,⁶ to reduce the risk that scorecard results are relied upon for purposes the Bureau has expressly disclaimed.

VIII. CONCLUSION

INCOMPAS again commends the Commission's continued efforts to protect consumers from illegal robocalls and supports the goal underlying the scorecard proposal. INCOMPAS urges the Commission, however, to resolve the data standardization, attribution, and analytics-accuracy issues identified above before finalizing a scorecard methodology, to ensure that the resulting tool provides consumers with accurate and fair information.

Respectfully submitted,

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⁶ See *Notice* at para. 23.