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Robocall Mitigation Database Filing Requirements

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This article discusses the Robocall Mitigation Database (RMD) launched by the FCC for voice service providers (VSPs) to register their STIR/SHAKEN deployment status and submit robocall mitigation plans, emphasizing the necessity for compliance with FCC directives and potential consequences for non-registration. The article also includes definitions for commonly used terms and helpful FAQs.

ATTENTION COREDIAL PARTNERS: Please refer to [this article](#) for instructions regarding CAM.

Notice: This document is intended for general informational purposes only. It does not constitute legal, financial, or professional advice. Readers should consult their compliance partners for legal advice.

Descriptions / Terminology

- STIR/SHAKEN – industry standards that establish a technology framework for caller identification that was designed to help reduce fraudulent robocalling and illegal phone number spoofing. Provider

participation in the framework enables Internet Protocol-based providers to more readily verify the caller ID information transmitted with a call (known as a call signature or attestation).

- **[Telephone Robocall Abuse Criminal Enforcement and Deterrence \(TRACED\) Act](#)** – legislation passed by the United States Congress with the purpose of fighting unwanted and illegal robocalls. This Act authorized the FCC to establish and enforce sweeping new requirements for VSPs to protect consumers from illegal robocalls.
- **[Federal Communications Commission \(FCC\)](#)** – a United States government agency overseen by Congress, responsible for implementing and enforcing US communications laws and regulations.
- **Public Switched Telephone Network (PSTN)** – the network of the world’s public telecommunications networks. In short, this is what allows for the exchange of communications that rely upon the use of telephone numbers.

Robocall Mitigation Background

As we know, unwanted calls, including illegal and spoofed robocalls, are the FCC’s top consumer complaint and protection priority. Over the past several years the FCC has issued numerous orders aimed at cracking down and stopping robocalls. You can learn more about this here: <https://www.fcc.gov/spoofed-robocalls>

The Robocall Mitigation Database is just one of the many tools the FCC has developed to help them fight the battle against robocalling activity.

Robocall Mitigation Database (RMD) FAQs

What is the RMD?

RMD (Robocall Mitigation Database) is a database launched by the FCC for voice service providers (VSPs) to register with the FCC, attest to the status of their STIR/SHAKEN deployment, and allow those who aren’t fully STIR/SHAKEN capable to formally file their robocall mitigation plans.

Do resellers need to register?

Yes. Registration is required for all VSPs, according to the FCC’s [orders and call-blocking directives](#). Because the TRACED Act requires that the STIR/SHAKEN framework be supported by all PSTN-interconnected IP-enabled inbound, outbound, and intermediate voice services, a very broad range of service providers are required to register their STIR/SHAKEN status within the RMD.

Who is considered a Voice Service Provider (VSP)?

For these purposes, the FCC has defined a Voice Service Provider (VSP) as:

A provider of “any service that is interconnected with the public switched telephone network and that furnishes voice communications to an end user using resources from the North American Numbering Plan or any successor to the North American Numbering Plan adopted by the Commission under section 251(e)(1) of the Communications Act of 1934, as amended” 47 C.F.R. 64.1600(r)(1).a.

If your end user customers view you as their service provider, and you’re providing outbound PSTN voice calling capabilities to them, then you’re expected to register in the RMD.

What happens if I don’t register in the RMD?

If SkySwitch determines you’re not validly registered in the FCC’s RMD, then we may be compelled to suspend your relevant services until you’ve registered in the RMD.

We know your business relies on our network integrity, which is why we take the responsibility to protect you from robocalling and the potential fraud caused by such activity, very seriously. To this end, we appreciate your participation in filing with the RMD.

Registration FAQs

How do I register with the RMD?

Compliance involves two steps:

1. Update of the certification filing within the RMD website
2. Preparation of a robocall mitigation plan document.

Here is some information to help you file with these RMD reporting requirements:

- Filing instructions to the Robocall Mitigation Database - [here](#)
- View the Small Business Compliance Guide - [here](#)

If you need help navigating the registration process, please contact a consultant or outside counsel to assist you with it. If you see inaccurate information in the database or need special assistance with the registration process, you should reach out to the FCC directly at RobocallMitigationDatabase@FCC.gov.

How do I know if my filing is valid?

The FCC will contact you if they find deficiencies. You can also contact them by email if you are concerned (RobocallMitigationDatabase@FCC.gov.)

How long does it take to register?

The filing process can take as little as 15 minutes to complete, especially if you already have a Federal Registration Number (FRN) from doing business with the FCC previously.

What if I don't have an FRN?

All VSPs should be filed with the FCC. For more information on this topic, go here:

[FCC and USAC Registration Guidelines](#)

Can SkySwitch help me with my RMD filing?

SkySwitch has provided the following information to assist you with your filing. Beyond this, you will need to consult your legal or compliance partner for assistance in this matter.

- Filing instructions to the Robocall Mitigation Database - [here](#)
- View the Small Business Compliance Guide - [here](#)

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