

**Before the
Federal Communications Commission
Washington, D.C.**

In the Matter of)	
)	
Targeting and Eliminating Unlawful Text Messages)	CG Docket No. 21-402
)	
Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991)	CG Docket No. 02-278
)	
Advanced Methods to Target and Eliminate Unlawful Robocalls)	CG Docket No. 17-59
)	

COMMENTS OF THE AMERICAN BANKERS ASSOCIATION, ACA INTERNATIONAL, AMERICAN FINANCIAL SERVICES ASSOCIATION, AMERICA’S CREDIT UNIONS, BANK POLICY INSTITUTE, MORTGAGE BANKERS ASSOCIATION, AND STUDENT LOAN SERVICING ALLIANCE TO THE SECOND FURTHER NOTICE OF PROPOSED RULEMAKING IN DOCKET NOS. 02-278 AND 21-402, AND WAIVER ORDER IN CG DOCKET NO. 17-59

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February 26, 2024

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INTRODUCTION AND SUMMARY

The American Bankers Association (ABA), ACA International, American Financial Services Association, America’s Credit Unions, Bank Policy Institute, Mortgage Bankers Association, and Student Loan Servicing Alliance (the Associations)¹ appreciate the opportunity to comment on the Second Further Notice of Proposed Rulemaking (*Second Further Notice*) in the above-captioned proceeding.²

Texts that impersonate legitimate businesses cause tremendous harm to consumers and undermine those businesses’ ability to communicate with their customers. The Associations have been strong proponents of regulatory proposals intended to curb these abusive and dangerous practices. In comments submitted during this rulemaking process, our primary objective has been to ensure that actions to curb illegal automated calls and texts also seek to minimize the blocking of lawful, consented-to communications and to provide effective redress mechanisms when erroneous blocking occurs.

In comments that the Associations submitted last June, our members reported that bad actors are increasingly using text messages to impersonate banks, credit unions, and other financial services providers with intent to defraud.³ Those problems persist today, causing harm to these institutions and their customers. The primary method used by bad actors is to deliver Short Message Service (SMS) “phishing” text messages (or “smishing”) – i.e., text messages

¹ A description of each Association is in the Appendix.

² *Targeting and Eliminating Unlawful Text Messages, Rules and Regulations Implementing the Tel. Consumer Prot. Act of 1991, Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket Nos. 21-402, 02-278 & 17-59, Second Report and Order, Second Further Notice of Proposed Rulemaking in CG Docket Nos. 02-278 and 21-402, and Waiver Order in CG Docket No. 17-59, FCC 23-107 (Dec. 18, 2023) (*Second Order* or *Second Further Notice*).

³ See Reply Comments of Am. Bankers Ass’n *et al.*, *Targeting and Eliminating Unlawful Text Messages, Rules and Regulations Implementing the Tel. Consumer Prot. Act of 1991*, CG Docket Nos. 21-402 & 02-278, (June 6, 2023), <https://www.fcc.gov/ecfs/document/106072171018174/1> (Joint Trades Comments).

sent from the bad actor’s own phone number that purport to be from a legitimate business to induce the recipient to reveal account information or click on links that install malware on the recipient’s phone.⁴ Association members continue to report that bad actors are distributing large volumes of SMS phishing messages from e-mail addresses (which convert the e-mail message to an SMS text message) and from 10-digit telephone numbers that are not associated with the businesses being impersonated. Bad actors often send these “e-mail to SMS” messages from telephone numbers that cannot accept incoming calls. These numbers are not uniquely assigned to different e-mail addresses, and therefore, they cannot easily be reported and shut down.

Illegal text messages used to commit fraud or scams cost consumers nearly \$10.1 billion in 2021.⁵ Currently, more fraudulent texts are sent—87.8 billion in 2021, up 58 percent from 2020—than fraudulent calls placed (72.2 billion in 2021).⁶ Imposter scams—where the bad actor impersonates a bank or other legitimate business—resulted in victims losing \$800 on average per scam in 2023, according to consumers’ reports to the Federal Trade Commission.⁷ Illegal texts also lead customers to question the legitimacy of the important messages that legitimate companies send, degrading our members’ ability to communicate with their customers and eroding their customers’ trust. The volume of text messages sent that impersonate legitimate companies—and the high financial cost to consumers who fall victim to these illegal schemes—underscore the urgency of the Commission’s work to stifle the ability of bad actors to send these messages.

⁴ See Barracuda, *What is Smishing?*, <https://www.barracuda.com/support/glossary/smishing> (last visited Feb. 26, 2024).

⁵ AARP, *Ways to Avoid Smishing* (June 6, 2023) (on file with the author).

⁶ *Id.*

⁷ Fed. Trade Comm’n, Consumer Sentinel Network, Data Book 2023, at 8 (2023), https://www.ftc.gov/system/files/ftc_gov/pdf/CSN-Annual-Data-Book-2023.pdf.

Our members continue to invest significant resources to protect their customers from fraudulent text messages, as well as from fraudulent e-mails and voice calls. For example, more than 2,000 banks from across the country participate in ABA’s #BanksNeverAskThat anti-phishing campaign to educate customers about phishing scams and how to avoid being victimized by them.⁸

In response to the *Second Further Notice*, the Associations respectfully urge the Commission to take the following actions:

- Require originating providers – in addition to terminating providers – to block texts from a sender after they receive notice from the Commission that the sender is transmitting suspected illegal texts;
- Ensure that agency-mandated or voluntary text blocking identifies only texts that have a clear indicia of illegality and that this blocking is undertaken on a content-neutral, non-discriminatory basis;
- Require opt-in for text messages that originate as e-mails (“email-to-text” messages);
- Propose a rule that requires originating providers to provide access to reported “spam” texts (i.e., those texts that are forwarded to a provider via #7726 (SPAM)) to those companies who wish to use the data to find impersonation texts relevant to their company and act on that information to protect their customers;
- Require prompt and effective redress for erroneous blocking of legal texts; and
- Require text message providers to finalize standards for, and implement, text message authentication technology and protocols.

⁸ Am. Bankers Ass’n, *BanksNeverAskThat.com*, <https://www.banksneveraskthat.com/about> (last visited Feb. 26, 2024).

ARGUMENT

I. THE ASSOCIATIONS SUPPORT REQUIRING ORIGINATING PROVIDERS TO BLOCK TEXT MESSAGES UPON NOTIFICATION FROM THE COMMISSION

The Second Report and Order (*Second Order*), which the Commission released simultaneously with the *Second Further Notice*, requires terminating mobile wireless providers to block all texts from a particular number when notified by the Commission of illegal texts from that number.⁹ In our comments submitted last June, the Associations urged the Commission to apply this requirement to entities that originate text messages.¹⁰ We commend the Commission for proposing this step, and we support it. When an entity is on notice from the Commission that a sender is transmitting suspected illegal texts, the entity should block texts from that sender. In the calling context, the Commission has required originating voice service providers to effectively mitigate illegal traffic generated by their customers and in an order released on May 19, 2023, required originating providers to block illegal traffic upon notification.¹¹ The Commission should adopt the same or a similar rule for entities that originate text messages.

II. THE COMMISSION SHOULD REQUIRE MOBILE WIRELESS PROVIDERS TO FINALIZE STANDARDS FOR, AND IMPLEMENT, TEXT MESSAGE AUTHENTICATION TECHNOLOGY AND PROTOCOLS

In September 2022, the Commission tentatively concluded that mobile wireless providers should implement caller ID authentication for text messages.¹² However, in the *Second Order*, the Commission declined to mandate caller ID authentication for texts because the record

⁹ *Second Order*, ¶¶ 16-20.

¹⁰ Joint Trades Comments at 9-10.

¹¹ *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, FCC 23-37, ¶ 29 (released May 19, 2023).

¹² *Targeting and Eliminating Unlawful Text Messages*, Notice of Proposed Rulemaking, FCC 22-72, CG Docket No. 21-402, ¶¶ 28-36 (released Sept. 27, 2022).

reflected that number spoofing was rare.¹³ But there is consensus in the record that identity spoofing through text messages is a key problem.¹⁴ Therefore, the Commission should focus on authenticating the text sender rather than simply extending the STIR/SHAKEN caller ID authentication framework to the SMS ecosystem. The wireless industry has informed the Commission that mobile wireless providers and organizations that set voluntary technical standards are working toward additional authentication solutions. As noted by CTIA, “[t]echnical and operational authentication solutions are being actively considered . . . [T]he Commission should encourage the wireless industry to continue evaluating potential technical and operational solutions to enhance authentication on text messaging networks.”¹⁵ We appreciate that the wireless industry is evaluating solutions, but the Commission should do more than encourage the development of solutions. It should require mobile wireless providers to provide the Commission with updates, on a set schedule, of the nature and status of providers’ work to develop and implement solutions to provide authentication of text senders. As necessary

¹³ *Second Order*, ¶ 54.

¹⁴ See *Targeting and Eliminating Unlawful Text Messages, Rules and Regulations Implementing the Tel. Consumer Prot. Act of 1991*, CG Docket Nos. 21-402 & 02-278, Reply Comments of CTIA, at 8 (filed June 7, 2023), <https://www.fcc.gov/ecfs/document/10606087722721/1> (CTIA June 2023 Reply Comments) (“There is also broad agreement in the record that the predominant method employed in spam text messaging involves *identity* spoofing instead of *number* spoofing—that is, brand impersonation or government agency impersonation scams designed to extract sensitive personal information from unaware consumers.”) (emphasis in original); *Targeting and Eliminating Unlawful Text Messages*, CG Docket No. 21-402, Reply Comments of CTIA, at 11 (filed Dec. 9, 2022), <https://www.fcc.gov/ecfs/document/1209746509660/1> (CTIA Dec. 2022 Reply Comments) (“In fact, the record demonstrates that brand impersonation, and not illegitimate use of valid telephone numbers (i.e., spoofing), is the predominant cause of spam text messages.”).

¹⁵ *Targeting and Eliminating Unlawful Text Messages*, CG Docket No. 21-402, Comments of CTIA, at 19 (filed Nov. 10, 2022), <https://www.fcc.gov/ecfs/document/11101045415230/1> (CTIA Nov. 2022 Comments); see also CTIA Dec. 2022 Reply Comments, at 13 (noting that “industry experts are actively evaluating various technical and operational solutions to mitigate spam messages through IETF, ATIS IP-NNI Task Force, and through CTIA’s Secure Messaging Initiative”); *Targeting and Eliminating Unlawful Text Messages, Rules and Regulations Implementing the Tel. Consumer Prot. Act of 1991*, CG Docket Nos. 21-402 & 02-278, Reply Comments of T-Mobile USA, Inc., at 5-6 (filed June 7, 2023), <https://www.fcc.gov/ecfs/document/1060630279920/1> (stating the Commission should encourage industry-driven solutions for authentication”).

and feasible, the Commission should develop firm deadlines for providers to deploy authentication technologies.

III. THE COMMISSION SHOULD PROPOSE THAT PROVIDERS BE REQUIRED TO PROVIDE ACCESS TO REPORTED “SPAM” TEXTS TO THOSE COMPANIES WHO WISH TO USE THE DATA TO FIND IMPERSONATION TEXTS RELEVANT TO THEIR COMPANY

In addition to mandating an authentication regime for text messages, the Commission should facilitate legitimate businesses’ access to information to protect customers from fraudulent texts. Currently, the telecommunications industry asks members of the public to forward scam texts to the short code 7726, which spells “SPAM” on a phone. Obtaining access to these spam messages would assist our members with identifying bad actors that are impersonating the member and the fake phone numbers and links sent by the bad actors to consumers. One bank worked with telecommunications companies to establish a pilot program whereby the bank gained access to and reviewed reported SPAM data. The bank then used that data to actively issue “take-down requests” to telecommunications companies, asking them to make the relevant phone numbers and internet links not functional. Unfortunately, this program was discontinued because the telecommunication companies revoked the bank’s access to the data.

To disrupt fraud, we urge the Commission to ensure legitimate businesses are allowed to access, with appropriate privacy safeguards, data from scam/spam reporting services, whether it is the 7726 data, the “Report Junk” data in Apple’s iMessage application, or other similar scam/spam reporting features in other closed messaging applications. The Commission should issue, and seek comment on, a proposal that would require mobile wireless providers to provide financial institutions with access to this data in as close to real time as possible. The wireless industry has expressed support for additional information sharing between government and

industry actors but their current efforts do not provide the near real-time access needed or ensure access to multiple carriers' 7726 data or "Report Junk" data.¹⁶ The Commission's proposal could build on these existing industry efforts to share information.

Additionally, as part of the proposal, the Commission should propose that all significant messaging services be required to operate a "Report Spam" feature and be required to share that data so that businesses can protect their customers.

IV. THE COMMISSION SHOULD REQUIRE VOLUNTARY BLOCKING TO BE CONTENT-NEUTRAL

The Commission seeks comment on whether to require or incentivize providers to block texts based on reasonable analytics.¹⁷ The Associations have repeatedly expressed concern that the use of reasonable analytics for blocking voice calls using factors such as call volume and duration has led to the mislabeling and erroneous blocking of legitimate and sometimes critical messages.¹⁸ In the texting context, mobile wireless providers are able to assess content in real time,¹⁹ and they can check suspicious website links in text messages.²⁰ Moreover, wireless

¹⁶ See CTIA Dec. 2022 Reply Comments, at 14-15 (expressing support for information sharing between industry and government). For example, CTIA has developed a Secure Messaging Initiative, which it describes as "a central clearinghouse that providers and government agencies can use to share information about suspected spam text messages and activity . . ." CTIA, *CTIA Secure Messaging Initiative*, <https://www.ctia.org/ctia-secure-messaging-initiative> (last visited Feb. 26, 2024). Callers are not involved with the Secure Messaging Initiative. Although the knowledge CTIA has gained in developing the Secure Messaging Initiative could assist with facilitating the sharing, with financial institutions, of 7726 and other data in the possession of carriers, it is critical that the data be shared in real time, and not less frequently.

¹⁷ *Second Further Notice*, ¶¶ 75-78.

¹⁸ See, e.g., *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket Nos. 17-59 & 17-97, Comments of Am. Bankers Ass'n *et al.*, at 9 (filed Aug. 9, 2023), <https://www.fcc.gov/ecfs/document/108100286505590/1>. Legitimate messages, such as school closing and fraud alerts, display the same characteristics of high volume, short duration calls as illegal calls and thus may be erroneously blocked or labeled as spam. The Associations therefore recommended that three common factors used in voice calling analytics – large bursts over a short period, low average call duration, and low call completion rates – should be not used to block voice calls without further indicia of illegality. *Id.* at 8-9.

¹⁹ See *Second Further Notice*, ¶¶ 72 & 77.

²⁰ CTIA Nov. 2022 Comments at 8.

providers require companies that wish to engage in bulk text messaging campaigns to first register with the Campaign Registry or risk having their texts blocked.²¹ Consequently, any analytics-based text blocking that providers employ should leverage these capabilities to identify messages that have clear indicia of illegality. Factors used in the voice context to identify illegal calls, such as low call duration and completion rates, would appear to be far less predictive of illegal messages in the texting context.

The Associations are concerned that the wireless industry’s voluntary blocking practices are undertaken without any government oversight and without following the existing regulatory requirement that blocking “analytics are applied in a non-discriminatory, competitively neutral manner.”²² This has led to unfair application in certain industries, particularly collections. For example, the wireless industry touts as a center piece of its best practices the requirement to obtain consent to receive texts even when federal or state laws, such as the Telephone Consumer Protection Act, do not mandate consent.²³ Yet wireless providers or their aggregator partners block consented-to messages based solely on wireless providers’ decision that some content, such as debt collection, is disfavored.²⁴

The Commission should ensure that wireless industry voluntary blocking complies with basic precepts of content-neutrality and prevent companies from outright blocking of lawful,

²¹ See The Campaign Registry, Quick Reference Guide https://www.10dlc.org/tcr_quick_reference_guide.pdf; see also CTIA Nov. 2022 Comments at 7 (“As a threshold protection against unwanted and illegal text messages, wireless providers require up-front vetting for entities that seek to originate bulk text messages.”); CTIA June 2023 Reply Comments (as acknowledged by the National Consumer Law Center, “campaigns that do not go through the registry process are subject to significantly greater scrutiny and likelihood of blocking”).

²² 47 C.F.R. § 14.1200(k)(11)(v).

²³ See, e.g., CTIA June 2023 Reply Comments at 2; *Targeting and Eliminating Unlawful Text Messages*, CG Docket No. 21-402, Comments of T-Mobile USA, Inc, at 6 (filed Nov. 10, 2022), <https://www.fcc.gov/ecfs/document/1110515408223/1> (T-Mobile Nov. 2022 Comments).

²⁴ See T-Mobile, *Code of Conduct*, § 5.2, <https://www.t-mobile.com/support/public-files/attachments/T-Mobile%20Code%20of%20Conduct.pdf> (identifying debt collection as “disallowed content”).

consented-to communications from companies. To the extent that wireless providers require vetting and pre-approval, providers should enable all legitimate companies, including debt collectors, to engage in that process and promptly approve and transmit texts from companies that pass the vetting process.

V. THE COMMISSION SHOULD REQUIRE MOBILE WIRELESS PROVIDERS OR THEIR PARTNERS TO PROVIDE IMMEDIATE NOTIFICATION OF BLOCKING AND RESOLVE DISPUTES WITHIN SIX HOURS

The Commission should require mobile wireless providers or their aggregator partners to provide notification to the text sender when a provider blocks a text message and to promptly resolve claims of erroneous text blocking—i.e., within six hours of receiving a report that a text was erroneously blocked.²⁵ The Commission should require effective and transparent redress for both Commission-mandated blocking and voluntary blocking undertaken by the industry. Redress is particularly critical because the provider or aggregator often blocks all messages originating from a single number if some texts from that number are identified as suspicious. The business placing the text messages may effectively lose the ability to send messages from that number, severely impacting the business’ operations.

We appreciate that the Commission has required wireless carriers to establish a single point of contact that applies to both agency-directed and voluntary blocking of text messages.²⁶ The Commission established the point of contact “with the goal of swiftly receiving and resolving complaints of unwarranted blocking of text messages.”²⁷ The wireless industry states that providers already have resources available to address erroneous text blocking.²⁸ Thus,

²⁵ See *Second Further Notice* at ¶ 80 (seeking comment on whether the Commission should require that notification be provided when texts are blocked).

²⁶ See *Targeting and Eliminating Unlawful Text Messages, Rules and Regulations Implementing the Tel. Consumer Prot. Act of 1991*, CG Docket Nos. 21-402 & 02-278, ¶¶ 27 & 30 (released Mar. 17, 2023).

²⁷ *Id.*, ¶ 27.

²⁸ CTIA Nov. 2022 Comments at 16.

formalizing redress obligations in the Commission's rules for text messages should not create additional burdens for the industry, but will create uniform standards to ensure that the Commission's goal of swiftly resolving legitimate complaints of erroneous text blocking will be met.

We respectfully urge the Commission to require providers to notify the sender immediately when the provider has blocked the sender's text message. A sender of text messages can only take action to dispute an erroneous block if the sender knows that its text message has been blocked. Those members of the Associations who have experienced the blocking of their outbound text messages continue to report that they do not consistently receive notice when their texts are blocked. Therefore, the Commission should require immediate notification of blocking.

As we have recommended previously, we also urge the Commission to require terminating providers to resolve disputes immediately, and no longer than six hours after receiving the dispute.²⁹ The ability of consumers to receive text messages from the companies with which they do business is critical to consumers' financial health and safety. When a financial institution attempts to send a text message to confirm that an attempted transaction is legitimate and not fraudulent, the customer must receive and respond to the text message immediately or the institution may stop the transaction from being completed. Similarly, when a company sends a text message to allow its customer to sign into his or her account (under multi-factor authentication), the customer must receive and respond to the text message immediately to gain access to the account. Under these circumstances, the provider should resolve the dispute over the blocking immediately. In no event should the resolution occur more than six hours after

²⁹ See Joint Trades Comments at 12-13; *Targeting and Eliminating Unlawful Text Messages*, CG Docket No. 21-402, Comments of Am. Bankers Ass'n *et al.*, at 7-8 (filed Nov. 10, 2022), <https://www.fcc.gov/ecfs/document/1111457307833/1>.

the text sender's report of the blocking. ABA members report that, based on their extensive work with voice service providers, terminating providers have the technical capability to resolve disputes within six hours.

CTIA states that aggregators, not terminating wireless carriers, are primarily responsible for network blocking.³⁰ In many instances, however, aggregators block calls based on the policies developed by wireless carriers.³¹ Effective and transparent redress obligations should apply to whichever entity in the text chain engages in the blocking. The fact that any number of entities in the chain of the text message may be responsible for blocking is even more reason for the blocker to provide prompt notification of blocking.

VI. THE COMMISSION SHOULD REQUIRE PROVIDERS TO MAKE EMAIL-TO-TEXT AN OPT-IN SERVICE

The Commission has proposed to require providers to make email-to-text an opt-in service, so that subscribers wishing to receive these types of messages would first have to opt into the service.³² Last June, the Associations raised concerns with the proclivity of bad actors to use email-to-text as a primary means to place a large volume of illegal texts quickly.³³ We commend the Commission for proposing this requirement, and we support it. As stated above, bad actors are distributing large volumes of SMS phishing messages from e-mail addresses (which convert the e-mail message to an SMS text message) and from 10-digit telephone numbers that are not associated with the businesses being impersonated. Bad actors often send

³⁰ See *Targeting and Eliminating Unlawful Text Messages, Rules and Regulations Implementing the Tel. Consumer Prot. Act of 1991*, CG Docket Nos. 21-402 & 02-278, CTIA *Ex Parte* Presentation, at 4, <https://www.fcc.gov/ecfs/document/10308223674007/1> (noting that aggregators and other stakeholders are the forefront of text blocking activities).

³¹ See, e.g., T-Mobile Nov. 2022 Comments at 5 (noting that T-Mobile requires aggregators to ensure that their customers comply with T-Mobile's Code of Conduct).

³² *Second Further Notice*, ¶ 86.

³³ See Joint Trades Comments at 8-9.

these “e-mail to SMS” messages from invalid telephone numbers – i.e., from telephone numbers that cannot accept incoming calls. These numbers are not uniquely assigned to different e-mail addresses and therefore cannot easily be reported and shut down.

CONCLUSION

The Associations support the Commission’s efforts to combat illegal text messages. We support the Commission’s proposal to require originating providers to block texts from a sender after they are on notice from the Commission that the sender is transmitting suspected illegal texts. We also agree with the Commission that it should require providers to make “email-to-text” an opt-in service, to help stop bad actors from utilizing this service to send large numbers of illegal text messages in a short period of time.

In addition to these steps, we urge the Commission to require mobile wireless providers to finalize standards for, and implement, text message authentication technology and protocols. In addition, we urge the Commission to propose a requirement that providers provide access to reported spam texts to those companies who wish to use the data to find impersonation texts relevant to their company.

At the same time, the Commission should not impede the completion of text messages sent by legitimate businesses to their customers and other consumers. To protect these text messages, the Commission should require mobile wireless providers, when engaged in agency-mandated or voluntary text blocking, to block only those messages that have clear indicia of illegality and to do so in a content-neutral manner. The Commission also should require mobile wireless providers or other entities in the texting chain that block texts to notify the sender immediately when the provider has blocked the sender’s text message and to resolve disputes no longer than six hours after receiving the dispute.

Respectfully submitted,

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APPENDIX

The American Bankers Association is the voice of the nation's \$23.4 trillion banking industry, which is composed of small, regional and large banks that together employ approximately 2.1 million people, safeguard \$18.6 trillion in deposits and extend \$12.3 trillion in loans.

ACA International represents approximately 1,700 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, in an industry that employs more than 113,000 people worldwide. Most ACA member debt collection companies are small businesses. The debt collection workforce is ethnically diverse, and 70% of employees are women. ACA members play a critical role in protecting both consumers and lenders. ACA members work with consumers to resolve their past debts, which in turn saves every American household more than \$700 year after year. The ARM industry is instrumental in keeping America's credit-based economy functioning with access to credit at the lowest possible cost.

America's Credit Unions is the national trade association for consumers' best option for financial services: credit unions. America's Credit Unions advocates for policies that allow credit unions to effectively meet the needs of their nearly 140 million members nationwide.

The American Financial Services Association (AFSA) is the national trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with closed-end and open-end credit products including traditional installment loans, mortgages, direct and indirect vehicle financing, payment cards, and retail sales finance.

The Bank Policy Institute is a nonpartisan public policy, research and advocacy group, representing the nation's leading banks and their customers. Our members include universal

banks, regional banks and the major foreign banks doing business in the United States.

Collectively, they employ almost two million Americans, make nearly half of the nation's small business loans, and are an engine for financial innovation and economic growth.

The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry that works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans.

The Student Loan Servicing Alliance (SLSA) is the nonprofit trade association that focuses exclusively on student loan servicing issues. Our membership is responsible for servicing over 95% of all federal student loans and the vast majority of private loans, and our membership is a mix of companies, state agencies, non-profits and their service partners. Our servicer members and affiliate members provide the full range of student loan servicing operations, repayment support, customer service, payment processing, and claims processing for tens of millions of federal and private loan borrowers across the country.