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NEWS FOR IMMEDIATE RELEASE

September 10, 2026

Wisconsin DOJ Pushes Federal Government to Strengthen Rules to Combat Illegal Robocalls

MADISON, Wis. — The Wisconsin Department of Justice (DOJ) and a bipartisan coalition are pushing the Federal Communications Commission (FCC) to strengthen its "Know Your Upstream Provider" (KYUP) requirements to help prevent scammers from using the U.S. phone network to make illegal robocalls. KYUP rules require voice service providers to ensure that they receive calls from legitimate and responsible providers and do not regularly pass through lots of illegal calls.

"The gate-keeping currently being done for access to the U.S. phone network obviously isn't sufficiently cutting off robocalls," said AG Kaul. "The FCC needs to require voice service providers to meaningfully step up their efforts to keep scammers off that network."

Phone calls get routed through a series of phone companies before they reach your phone. The FCC requires all voice service providers to take reasonable measures to vet the phone companies that originate and route calls. However, some voice service providers fail to do so, allowing illegal robocalls onto the U.S. communications network. Last year, Americans received more than 29.6 billion scam robocalls and texts and lost nearly $2 billion to these scams.

The coalition is asking the FCC to strengthen voice service providers' obligation to vet their upstream providers, which are telecommunications companies that can help route calls from local voice service providers across the country or world. The coalition is also asking the FCC to require voice service providers to impose the same level of

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scrutiny on upstream providers as they would entities involved in the implementation of the framework developed to prevent caller ID spoofing.

In addition to what the FCC is already doing, the coalition urges it to:

- Mandate five categories of baseline KYUP measures. The attorneys general are asking the FCC to demand that voice service providers collect more detailed—and verified—information from their upstream provider customers. The attorneys general also urge the FCC to require voice service providers to more thoroughly vet upstream providers' compliance with FCC rules, monitor those upstream providers regularly, and refuse or end service to upstream providers that aren't following the law.

- Require additional triggers for KYUP monitoring. Right now, a voice service provider generally monitors or reviews information about, or the conduct of, their upstream provider customers when they are entering into or renewing an agreement with the upstream provider, or when they receive evidence that an upstream provider may be breaking the law. The attorneys general argue that the FCC should require upstream provider monitoring more regularly to help prevent bad actors from operating unchecked.

- Strengthen STIR/SHAKEN protections. STIR/SHAKEN is a framework to ensure that a caller is placing calls from phone numbers that are not being spoofed. The FCC should ensure that providers are aware of and comply with their caller ID authentication obligations, and that these rules are being followed and applied similarly to and by everyone with responsibility for making sure that a call is really coming from the number a consumer sees as the caller ID, regardless of where they are in the path of a call.

- Implement new rules quickly, establish enforcement penalties, and require retention of KYUP data. The attorneys general ask that any rules to help cut down on illegal robocalls should be implemented as soon as possible. They also support base penalties for providers that don't meet upstream provider monitoring requirements or violate STIR/SHAKEN. They are also asking the FCC to require voice service providers to collect and retain data related to KYUP verification and monitoring, so that this data will be available to law enforcement or attorneys general for future investigations.

Wisconsin DOJ is part of the Anti-Robocall Multistate Litigation Task Force, which launched *Operation Robocall Roundup* in 2025.

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In phase 1 of the operation, the task force sent warning letters to 37 smaller voice providers that were disregarding their obligations to mitigate the origination and transmission of illegal and/or suspicious robocalls by failing to comply with certain baseline mandates from the FCC. Just two weeks ago, the FCC issued an order to six of those companies, ordering them to fix their robocall protection issues or risk losing the ability to route any calls across the U.S. telephone network.

In phase 2, the task force:

- Expanded its crackdown to four of the country's largest intermediate voice service providers.

- Pushed the FCC to strengthen its Know Your Customer rules to require phone companies to verify who is making calls using their networks and what kinds of business their customers are conducting.

Wisconsin DOJ is joined in signing this letter by the attorneys general of Alabama, Alaska, American Samoa, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, Virginia, Washington, West Virginia, and Wyoming.

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