

## FCC Requires Gateway Providers to Combat Foreign-Based Robocalls

The Federal Communications Commission recently adopted certain final rules, policies, and proposed rules to "stem the tide of foreign-originated illegal robocalls." The FCC Order targets so-called "gateway providers," which are U.S.-based intermediate providers that receive calls directly from a foreign provider or its U.S.-based facilities before transmitting the calls downstream. Among other things, the Order requires gateway providers to block illegal traffic upon notification from the FCC, respond to robocall traceback requests within 24 hours, and implement "know your upstream provider" obligations. The Order's proposed rules would extend most of the Order's obligations to all forms of U.S.-based telecom providers.

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