



*Interstate Telcom Consulting, Inc.*

Independent Telecommunications Consultants

**To: ITCI Clients**

**From: Jerry Burmeister**

**Date: January 23, 2026**

**Subject: New Robocall Requirements**

At our seminar in November we discussed several Robocalling issues:

1. New Robocall Mitigation Database (RMD) filing requirements.
2. New Originating Call Attestation rules.
3. New Do Not Originate requirements.
4. Potential new Call ID requirements.

Effective February 5, 2026, the FCC has a new requirement that your RMD plan be certified as correct annually and the filing will have a \$100 fee. They have not yet set a timeline as to when this will need to be done. They backed off on the proposed \$100 filing fee for whenever changes are made to the RMD.

The FCC has also implemented new financial penalties for submitting false, inaccurate or late reporting to the RMD. The FCC will impose a fine of \$10,000 for submitting false or inaccurate information and a \$1,000 fine for each entry not updated within 10 business days. Because of these large penalties, it is quite important that your Call Mitigation Plan is accurate. Following is a questionnaire that we would like you to complete and provide back to our office.

130 Birch Avenue West • P.O. Box 668 • Hector, Minnesota • 55342-0668  
Telephone (320) 848-6641 • Fax (320) 848-2466  
[itci@interstatetelcom.com](mailto:itci@interstatetelcom.com)

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Company \_\_\_\_\_

Yes                      No

Do you have any IP trunking for LD traffic?                      \_\_\_\_\_

If yes, who is this trunking to: \_\_\_\_\_

Did you obtain a Service Provider Code (SPC) token and a Stir/Shaken Digital Certificate?                      \_\_\_\_\_

If your company did not obtain a token or certificate, whose are you using: \_\_\_\_\_

For the STIR/SHAKEN requirements, are you using another vendor? (MetaSwitch, Ribbon, TransNexus, etc.)                      \_\_\_\_\_

If yes, who are you using? \_\_\_\_\_

Are you assigning your own "Attestation Level" to originating calls?                      \_\_\_\_\_

If not, who is assigning the level? \_\_\_\_\_

Which vendor are you using for the new "Do Not Originate" requirement? \_\_\_\_\_

Completed by: \_\_\_\_\_

E-mail completed form to: [jerryb@interstatetelcom.com](mailto:jerryb@interstatetelcom.com)

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