

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

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

**COMMENTS OF THE AMERICAN BANKERS ASSOCIATION, ACA  
INTERNATIONAL, AMERICAN FINANCIAL SERVICES ASSOCIATION,  
AMERICA’S CREDIT UNIONS, BANK POLICY INSTITUTE, CONSUMER BANKERS  
ASSOCIATION, DEFENSE CREDIT UNION COUNCIL, ELECTRONIC  
TRANSACTIONS ASSOCIATION, FINANCIAL TECHNOLOGY ASSOCIATION,  
MORTGAGE BANKERS ASSOCIATION, AND STUDENT LOAN SERVICING  
ALLIANCE TO THE FURTHER NOTICE OF PROPOSED RULEMAKING**

Jonathan Thessin  
Vice President/Senior Counsel  
American Bankers Association  
1333 New Hampshire Avenue, NW  
Washington, DC 20036  
(202) 663-5016

Scott Purcell  
CEO  
ACA International  
509 2<sup>nd</sup> Street NE  
Washington DC 20002  
(952) 259-4205

Philip Bohi  
General Counsel  
American Financial Services Association  
1750 H St NW Suite 650  
Washington, DC 20006  
(202) 466-8605

James Akin  
Head of Regulatory Advocacy  
America’s Credit Unions  
99 M Street, SE  
Washington, DC 20003  
(800) 356-9655

Drew Ruben  
Senior Vice President, Associate General  
Counsel  
Bank Policy Institute  
1300 Eye Street, NW  
Washington, DC 20005  
(202) 589-2443

Brian Fritzsche  
Vice President, Associate General Counsel  
Consumer Bankers Association  
1225 New York Ave., NW  
Washington, DC 20005  
(202) 552-6381

Jason Stverak  
Chief Advocacy Officer  
Defense Credit Union Council  
1627 Eye Street, NW, Suite 935  
Washington, DC 20006  
(202) 734-5007

Patrick Russell  
Vice President of Government Affairs  
Electronic Transactions Association  
1300 Connecticut Ave NW, Suite #475  
Washington, DC 20036  
(202) 828-2635

Angelena Bradfield  
Head of Policy  
Financial Technology Association  
601 13th Street, NW, Floor 12  
Washington, DC 20005  
(209) 324-9456

Alisha Sears  
Director, Regulatory Counsel  
Mortgage Bankers Association  
1919 M Street, NW, 5<sup>th</sup> Floor  
Washington, DC 20036  
(202) 557-2930

Scott Buchanan  
Executive Director  
Student Loan Servicing Alliance  
2210 Mt. Vernon Avenue  
Suite 207  
Alexandria, VA 22301  
(202) 955-6055

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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, Consumer Bankers Association, Defense Credit Union Council, Electronic Transactions Association, Financial Technology Association, Mortgage Bankers Association, and Student Loan Servicing Alliance (collectively, the Associations)<sup>1</sup> appreciate the opportunity to comment on the Federal Communications Commission’s (Commission or FCC) Further Notice of Proposed Rulemaking that would impose stronger “know your customer” requirements on voice service providers that originate calls (Proposal).<sup>2</sup>

Fraud and scams are a pervasive problem that often takes an extraordinary financial and emotional toll on consumers. In a December 2025 report, the Federal Trade Commission estimated that 2024 fraud and scam losses totaled a staggering \$196 billion.<sup>3</sup> The financial services industry spends billions of dollars each year to educate and protect consumers from fraud and scams, investigate/refer potential criminal activity, and help affected consumers recover their hard-earned money.<sup>4</sup> But financial institutions cannot do this work alone.

Today, criminals perpetrate fraud and scams on consumers by illegally “spoofing” the number used in the caller ID. Existing FCC rules require each originating provider to take

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<sup>1</sup> A description of each Association is provided in the Appendix.

<sup>2</sup> *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket Nos. 17-59 & 02-278, Further Notice of Proposed Rulemaking (May 1, 2026) [hereinafter, *Proposal*].

<sup>3</sup> Fed. Trade Comm’n, *Protecting Older Consumers 2024-2025: A Report of the Federal Trade Commission* 28 (Dec. 1, 2025), [https://www.ftc.gov/system/files/ftc\\_gov/pdf/P144400-OlderAdultsReportDec2025.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/P144400-OlderAdultsReportDec2025.pdf).

<sup>4</sup> See, e.g., Joseph Ibitola, *Overcoming the Hidden Costs of AML Compliance*, Flagright (updated July 1, 2025), <https://www.flagright.com/post/overcoming-the-hidden-costs-of-aml-compliance#:~:text=AML%20compliance%20has%20become%20an,a%20financial%20firm's%20annual%20revenue> (reporting that, globally, banks and fintech companies spend an estimated \$206 billion per year on financial crime compliance).

“affirmative, effective measures” to prevent callers from “originat[ing] illegal calls, including knowing its customers . . . .” (the Effective Measures Rule).<sup>5</sup> But the Commission has not mandated specific standards for compliance with this rule.<sup>6</sup> Unlike financial institutions that have know your customer (KYC) and customer due diligence (CDD) obligations to help identify and report potential fraud and other illicit activity, voice service providers are not held to commensurate obligations, which facilitates the exploitation of calling networks by fraudsters. For example, an analysis of call records conducted for ABA identified an originating provider that opened for business in July 2025 and within two months of opening originated more than 136 million calls (in a single month) on its network.<sup>7</sup> Further analysis showed that the majority of calls originated by this provider were illegal calls.<sup>8</sup> Clearly, the originating provider did not adequately investigate the companies using its network to perpetrate fraud.

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<sup>5</sup> 47 C.F.R. § 64.1200(n)(4).

<sup>6</sup> See *In the Matter of Telnyx LLC*, File No. EB-TCD-24-00037170, FCC 25-10, ¶ 2 (Feb. 4, 2025), <https://docs.fcc.gov/public/attachments/FCC-25-10A1.pdf> (summarizing 47 C.F.R. § 64.1200(n)(4)); *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Fourth Report and Order ¶ 34 (Dec. 30, 2020), <https://docs.fcc.gov/public/attachments/FCC-20-187A1.pdf> (promulgating regulation that gave voice service providers “flexibility” in meeting KYC requirements). The Commission has endorsed certain due diligence steps in a consent decree reached with an IP-based Cloud voice and data provider involving deficient KYC controls, but has not mandated that others implement these KYC controls. See *In the Matter of Lingo Telecom, LLC*, Order, 39 FCC Rcd 9304, 9316-17, Att. 1 (2024).

<sup>7</sup> *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Dismissal of Outdated or Otherwise Moot Robocalls Petitions*, CG Docket Nos. 17-59, 02-278, & 25-307, WC Docket No. 17-97, Comments of the Am. Bankers Ass’n *et al.*, App. C, 12-13 (filed Jan. 5, 2026), <https://www.fcc.gov/ecfs/document/10106019480304/1> [hereinafter, ABA/Joint Trades’ Jan. 2026 Comments].

<sup>8</sup> As one piece of evidence that this originating provider was transmitting fraudulent calls, the provider had a Delaware address shared by approximately one hundred other entities and had a primary contact number in a foreign country.

In a comment submitted to the FCC in January 2026, the Associations urged the Commission to specify the steps that voice service providers must take to prevent criminals from originating fraudulent calls.<sup>9</sup> In this Proposal, the Commission has taken an important step toward requiring originating providers to “know their customer”—i.e., to collect specific information about a prospective customer—before the customer may originate calls on the provider’s network. We strongly support the Proposal.

We agree with the Commission that providers should collect a robust set of information from business callers—including name, physical address, alternate phone number, corporate formation records, and intended use of the provider’s phone service—before the provider allows the caller to originate calls on the provider’s network. However, we also urge the Commission to require originating providers to confirm that the business is bonded or has equivalent financial responsibility, to understand the product or service that the customer offers (in order to understand the customer’s purpose in seeking to place calls using the provider’s service), and to ensure that owners of the business have not previously been convicted of violating telemarketing laws. These additional steps would help ensure that only legitimate businesses have access to call networks.

We caution the Commission against imposing a less stringent set of KYC requirements for “low-volume” business callers than for “high-volume” business callers, as that could encourage a caller to establish numerous entities—each of which may seek a small number of telephone numbers—in order to evade more stringent KYC requirements.

We support the Commission’s proposal to codify a base forfeiture amount, on a per call basis, when a provider fails to take affirmative, effective measures to prevent callers from

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<sup>9</sup> *Id.* at 22-23.

originating illegal calls. In addition to imposing a base forfeiture amount, we urge the Commission to allocate sufficient funding and staffing to enforce its KYC regime—i.e., to have sufficient staff to investigate and, where appropriate, initiate enforcement actions to ensure that originating providers comply with the KYC rule.

Finally, we urge the Commission to initiate a rulemaking to ban the possession or supplying of Subscriber Identity Module (SIM) boxes, which allow a caller to place a large number of illegal calls quickly from what appears to be separate phone numbers.

## ARGUMENT

### **I. The Commission Should Require Originating Providers to Collect Specific Information from Business Callers Before Allowing the Caller to Originate Calls on the Provider’s Network**

We appreciate the Commission’s recognition that stronger “know your customer” requirements are an essential part of the agency’s work to combat illegal calls.<sup>10</sup> As in the example described above, when an originating provider fails to know information about a prospective customer/caller, the provider has opened the door to the origination of potentially hundreds of millions of illegal calls. We support the Commission’s work to address the inadequate application of KYC requirements by certain originating providers; effective customer due diligence is critical to mitigate fraud and scams.

We support the proposal to require originating providers to collect from all new and renewing customers a basic set of identifying information—including name, physical address, and alternate phone number—before the provider allows the caller to originate calls on the provider’s network.<sup>11</sup> We also agree with the Commission that originating providers should be

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<sup>10</sup> See *Proposal*, *supra* note 2, ¶ 8.

<sup>11</sup> *Id.*, ¶ 9.

required to collect from business customers the caller's corporate formation records, proof of good standing (such as a state-issued certification), confirmation that the telephone number provided is the customer's current active telephone number, third-party records of a customer's physical address, and verification of commercial presence (e.g., website, social media, store front).<sup>12</sup> In addition, we agree with the Commission that it should require originating providers to understand the business caller's intended purpose in placing calls and identify the customer's IP address from which each call will be placed.<sup>13</sup> Originating providers also should collect the caller's Employer Identification Number (EIN) or Business Registration Number, as the Commission suggests.<sup>14</sup> If a caller originates calls through an intermediary platform—such as a platform that gives a business caller cloud-based tools to place a high volume of calls—the originating provider should nonetheless be required to conduct KYC diligence on the business caller before allowing use of its services to originate calls.

In addition to the requirements listed above, we urge the Commission to require originating providers to confirm that the business is bonded (or has equivalent financial responsibility) and that the person operating the business has not previously been convicted of violating telemarketing laws. The Commission also should require the provider to understand the product or service that the customer offers, in order to understand the customer's purpose in seeking to place calls using the provider's service.<sup>15</sup> These steps would further ensure that the

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<sup>12</sup> *Id.*, ¶ 19.

<sup>13</sup> *Id.*, ¶ 9.

<sup>14</sup> *Id.*, ¶ 13.

<sup>15</sup> See ABA/Joint Trades' Jan. 2026 Comments, *supra* note 7, at 23 (suggesting the Commission require originating providers to take these steps before allowing a business to place calls on the provider's network).

caller is a legitimate business and not an entity whose primary purpose is to place calls in order to defraud call recipients.

We agree with the Commission that requiring originating providers to collect the information described above—including the additional pieces of information we suggest in the immediately preceding paragraph—will deter scammers from seeking to place illegal calls.<sup>16</sup> Specifically, it will deter repeat bad actor callers by disrupting the symbiotic relationship that these callers have with some originating providers that, to date, have failed to conduct meaningful diligence of callers. We also agree that, for those scammers that decide to place illegal calls, the collection of this information will assist the Commission, law enforcement, and stakeholders with understanding the identity of the entities that are placing these calls.<sup>17</sup>

We caution the Commission against imposing a less stringent set of KYC requirements for “low-volume” business callers than for “high-volume” business callers.<sup>18</sup> Imposing a different set of requirements based on factors such as the size of the business or the number of telephone numbers a business seeks from an originating provider may encourage a (bad actor) business caller to establish numerous entities—each of which may seek a small number of telephone numbers—in order to evade more stringent KYC requirements.

The Commission also seeks comment on ways to ensure any new KYC requirements complement any call branding or caller name requirements that the Commission may impose. In a separate notice of proposed rulemaking, the Commission proposed that originating providers “employ reasonable measures to verify the accuracy of the information transmitted” to the next

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<sup>16</sup> *Proposal*, *supra* note 2, ¶ 9.

<sup>17</sup> *Id.*, ¶ 9.

<sup>18</sup> *See id.*, ¶ 13 (asking if all business customers should be subject to the same KYC requirements regardless of call volume).

provider in the call’s pathway.<sup>19</sup> We believe that rigorous verification of caller information should be integrated with KYC requirements. The information collected and verified for caller information is the same type of information that should be collected and verified in the KYC process. Most importantly, we urge the Commission to finalize its enhanced KYC requirements as soon as feasible, regardless of when it promulgates a rule regarding call branding and caller name requirements.

## **II. The Commission Should Codify a Base Forfeiture Amount for Violations of the Commission’s Rules Requiring Providers to Take “Effective Measures” to Prevent the Origination of Illegal Calls**

The Commission proposes to impose a \$2,500 per call base forfeiture amount for violations of the Effective Measures Rule—i.e., for not taking “affirmative, effective measures” to prevent callers from “originat[ing] illegal calls, including knowing its customers . . . .”<sup>20</sup> We support this proposal. We agree with the Commission that codification of a base forfeiture amount would better encourage compliance with the Effective Measures Rule. Assessing fines on a per-call basis also would align the forfeiture amount with the harm caused by the provider’s violation of the rule, which invites illegal calls to be originated on its network.

We urge the Commission to make clear that the base forfeiture amount will apply to violations of the Effective Measures Rule *as revised* through this proceeding. It is critical that originating providers are incentivized to comply with the more robust set of KYC requirements that the Commission will finalize through this rulemaking.

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<sup>19</sup> *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Dismissal of Outdated or Otherwise Moot Robocalls Petitions*, Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-59, Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97, Further Notice of Proposed Rulemaking in CG Docket No. 02-278, and Public Notice in CG Docket No. 25-307, ¶ 43 (rel. Oct. 29, 2025),

<sup>20</sup> 47 C.F.R. § 64.1200(n)(4).

### **III. The Commission Should Allocate Additional Resources to Enforce its Enhanced “Know Your Customer” Regime for Originating Providers**

In addition to supporting a base forfeiture amount for violations of the Effective Measures Rule, we urge the Commission to allocate necessary funding and staffing resources to enforce its KYC regime—i.e., to have sufficient staff to investigate and, where appropriate, bring timely enforcement actions to ensure that originating providers are conducting the KYC diligence on callers that is required under the rule that the Commission finalizes. The example cited above—a fraudulent originating provider increased its calling operations from originating no calls one month to more than 136 million calls two months later—demonstrates the need for both specific KYC requirements and stronger enforcement. We strongly recommend the allocation of additional funding to the Commission’s Enforcement Bureau to mitigate the number of illegal calls.

### **IV. The Commission Should Ban SIM Boxes**

The Commission asks whether existing measures have proven effective at reducing the number of illegal calls being made using Subscriber Identity Module (SIM) boxes.<sup>21</sup> SIM boxes, which are readily available in the United States, allow the use of multiple SIM cards simultaneously, enabling high-volume illegal calling while masking the call’s origin to evade detection of the illegal calling scheme. Each SIM card allows an illicit actor to send calls or text messages that purport to originate from a different phone number.<sup>22</sup> Actors with a SIM box are therefore capable of placing thousands of fraudulent texts or calls to consumers at once. Because

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<sup>21</sup> *Proposal, supra* note 2, ¶ 15.

<sup>22</sup> *See* ABA/Joint Trades’ Jan. 2026 Comments, *supra* note 7, at App. C, 16 (describing growth of prepaid SIM card-enabled scam calls and text messages).

the calls purport to originate from different numbers, it is very difficult to track the calls' origin or stop this kind of illicit activity.

The use of SIM boxes has created a significant vulnerability in the ability of our telecommunications system to stop the origination of illegal calls. We urge the Commission to propose and then finalize a ban on the possession or supplying of SIM boxes.<sup>23</sup>

## CONCLUSION

We support the Commission's proposal to require originating providers to "know their customer" before allowing the customer to place calls on the provider's network—i.e., to require originating providers to collect a robust set of information from business callers. Strong KYC requirements will ensure all originating providers conduct meaningful diligence of callers, keeping bad-actor callers off the U.S. telecommunications network.

We also support the Commission's proposal to codify a per-call base forfeiture amount for providers that do not take affirmative, effective measures to prevent callers from originating illegal calls. We also urge the Commission to obtain necessary funding and staffing resources to enforce its KYC regime, and to propose and finalize a ban on SIM boxes.

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<sup>23</sup> The United Kingdom banned the possession or supplying of SIM boxes in April 2025.

The Commission has legal authority to ban SIM boxes under its long-standing authority to regulate "all facets of numbering administration in the United States." Second Report and Order and Memorandum Opinion and Order, 11 FCC Rcd 19392, 19512, ¶ 271 (1996). As referenced above, in 2020, under this authority, the Commission required voice service providers to implement the STIR/SHAKEN caller ID authentication framework to "prevent the fraudulent exploitation of numbering resources." *In the Matter of Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 & 20-67, Report and Order and Further Notice of Proposed Rulemaking ¶ 42 (rel. Mar. 31, 2020); *see also id.*, ¶¶ 3 & 68. A ban on SIM boxes similarly is intended to prevent criminals from fraudulently exploiting our nation's numbering resources by placing calls that purport to originate from a phone number that is different than the number from which the call actually originated.

Respectfully submitted,

s//Jonathan Thessin  
Jonathan Thessin  
Vice President/Senior Counsel  
American Bankers Association  
1333 New Hampshire Avenue, NW  
Washington, DC 20036  
(202) 663-5016

s//Scott Purcell  
Scott Purcell  
CEO  
ACA International  
509 2<sup>nd</sup> Street NE  
Washington DC 20002  
(952) 259-4205

s//Philip Bohi  
Philip Bohi  
General Counsel  
American Financial Services Ass'n  
1750 H St NW Suite 650  
Washington, DC 20006  
(202) 466-8605

s//James Akin  
James Akin  
Head of Regulatory Advocacy  
America's Credit Unions  
99 M Street, SE  
Washington, DC 20003  
(800) 356-9655

s//Drew Ruben  
Drew Ruben  
Senior Vice President, Associate General  
Counsel  
Bank Policy Institute  
1300 Eye Street, NW  
Washington, DC 20005  
(202) 589-2443

s//Brian Fritzsche  
Brian Fritzsche  
Vice President, Associate General  
Counsel  
Consumer Bankers Association  
1225 New York Ave., NW  
Washington, DC 20005  
(202) 552-6381

s//Jason Stverak  
Jason Stverak  
Chief Advocacy Officer  
Defense Credit Union Council  
1627 Eye Street, NW, Suite 935  
Washington, DC 20006  
(202) 734-5007

s//Patrick Russell  
Patrick Russell  
Vice President of Government Affairs  
Electronic Transactions Association  
1300 Connecticut Ave NW, Suite  
#475  
Washington, DC 20036  
(202) 828-2635

s//Angelena Bradfield  
Angelena Bradfield  
Head of Policy  
Financial Technology Association  
601 13th Street, NW, Floor 12  
Washington, DC 20005  
(209) 324-9456

s//Alisha Sears  
Alisha Sears  
Director, Regulatory Counsel  
Mortgage Bankers Association  
1919 M Street, NW, 5<sup>th</sup> Floor  
Washington, DC 20036  
(202) 557-2930

s//Scott Buchanan  
Scott Buchanan  
Executive Director  
Student Loan Servicing Alliance  
2210 Mt. Vernon Avenue  
Suite 207  
Alexandria, VA 22301  
(202) 955-6055

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## APPENDIX

The American Bankers Association is the voice of the nation's \$26.1 trillion banking industry, which is composed of small, regional and large banks that together employ over 2 million people, safeguard \$20.5 trillion in deposits and extend \$13.7 trillion in loans.

ACA International represents approximately 1,600 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, in an industry that employs more than 113,00 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.

Founded in 1916, AFSA is the primary trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including direct and indirect vehicle financing, traditional installment loans, mortgages, payment cards, and retail sales finance. AFSA members do not provide payday or vehicle title loans.

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 142 million members nationwide.

The Bank Policy Institute is a nonpartisan public policy, research and advocacy group that represents universal banks, regional banks, and the major foreign banks doing business in the United States. BPI produces academic research and analysis on regulatory and monetary

policy topics, analyzes and comments on proposed regulations, and represents the financial services industry with respect to cybersecurity, fraud, and other information security issues.

The CBA is a member-driven trade association, and the only national financial trade group focused exclusively on retail banking—banking services geared toward consumers and small businesses. As the recognized voice on retail banking issues, CBA provides leadership, education, research, and federal representation for its members. CBA members operate in all 50 states. They include the nation’s largest bank holding companies as well as regional and super-community banks. Eighty-seven percent of CBA’s members are financial institutions holding more than \$10 billion in assets.

The Defense Credit Union Council (DCUC) is a national trade association and trusted resource for credit unions serving military and veteran communities. Since 1963, DCUC has championed the interests of America’s credit unions through advocacy, education, collaboration, and engagement on legislative and regulatory matters that affect financial readiness, access, and support for servicemembers, veterans, and their families.

The Electronic Transactions Association (ETA) is the world’s leading advocacy and trade association for the payments industry. Its members—from global incumbents to emerging fintech innovators—process approximately \$56.75 trillion annually in purchases and person-to-person payments worldwide.

The Financial Technology Association (FTA) is a network of fintech leaders shaping the future of finance. We champion the power of technology-driven financial services to catalyze innovation and advocate for modernized policies and regulations that reflect this digital transformation.

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.