FCC Proposal- Know Your Customer Caller Verification Standards

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The Kansas Bankers Association (KBA) is a 501(c)(6) tax-exempt, not-for-profit trade association. KBA's membership includes 99% of the banks headquartered in Kansas. Our membership also includes 24 out-of-state commercial banks operating in Kansas. Our member banks employ more than 21,000 Kansans who provide financial services in every county across the state. While our member banks range in assets from the smallest to the largest in our state, each member bank that belongs to the KBA has one vote on policy positions adopted by either our general membership or our Board of Directors. The KBA appreciates the opportunity to comment on – and emphasize our strong support for – the FCC's efforts to impose strong "know your customer" requirements on originating voice service providers. Fraud is a pervasive problem that causes significant financial and emotional harm to consumers. The financial services industry spends billions each year to protect against fraud, investigate suspicious activity, and help customers recover their money. But the reality is that banks cannot block these attacks alone; originating providers must be held accountable for vetting the entities they allow onto their networks to distribute these mass-spoofing campaigns. Furthermore, while state legislatures are attempting to address this problem through statutory initiatives, the solution cannot be effectively implemented on a state-by-state basis when fraud originates on vulnerable multistate telecommunications infrastructure. Suppressing fraud on these networks is key. The strategy must be through a uniform federal regulatory scheme. We urge the FCC to impose stronger "know your customer" requirements on originating voice service providers. Clear "know your customer" requirements imposed by the FCC will help ensure that all originating providers properly verify their customers and keep bad actors off the U.S. telecommunications network. Thank you for the opportunity to comment. If you have any questions, please feel free to contact me, Terri D. Thomas, EVP-General Counsel, at 785-232-3444 or tthomas@ksbankers.com.