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ALERT

2025 State AG Robocall Enforcement Trends: Targeting of VoIP Service Providers Continues, With Coordinated AG Scrutiny of "Intermediate" Providers

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In 2025, states continued leading government efforts to address unlawful telemarketing and robocalls. One key theme emerging from their work was a continued emphasis on pushing VoIP service providers throughout the call path to do more to reduce illegal robocall traffic. And the state Attorneys General (AGs) have continued to maximize their resources and impact by collaborating with each other and federal partners. As a result, VoIP service providers face not only a complex array of enforcers, but also an equally complex regulatory landscape that makes compliance particularly challenging. Below, we discuss how state AGs have applied these laws and regulations to VoIP service providers throughout the call chain.

State AGs Leverage Multiple Legal Frameworks to Drive Joint Enforcement.

Many states have various regulatory tools in their enforcement arsenal, including telemarketing laws, do-not-call requirements, and telephone consumer protection laws. Often, these laws allow state AGs to seek civil penalties for violations. States are also authorized to enforce federal robocall laws including the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act (TICA), and the Telemarketing Sales Rule (TSR). Cumulatively, these state and federal laws adopt strict consent rules for calls to numbers on the National Do Not Call Registry, impose calling time restrictions, prohibit using

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prerecorded or artificial messages and automated dialing technology without proper consent, and ban caller ID spoofing. And the TSR includes language extending liability to "any person" who knowingly assists or facilitates certain types of telemarketing calls. States can obtain civil penalties for violations of the TCPA and TICA, and they can obtain injunctive relief under the TSR.

In addition to filing enforcement actions in their own state courts, AGs can also use the TCPA, TICA, and TSR to bring cases in federal court. And oftentimes, state AGs will pursue individuals and entities that were previously targeted by federal enforcement actions. For example, in October 2025 the Ohio Attorney General's (AG) office sought a default judgment against a robocall enterprise that operated both domestically and abroad after filing a complaint in July 2022, coinciding with a similar enforcement action by the Federal Communications Commission (FCC). The complaint in that case alleged violations of Ohio state law as well as the TCPA and TSR.

The ability to bring cases also facilitates AGs' ability to collaborate, providing a forum for joint action. In one notable instance in 2020, a bipartisan group of seven states filed a lawsuit against an operation led by John Spiller that allegedly used illegal robocalls to market health insurance and health discount plans. Notably, the states sued not only the telemarketer but also a wholesale VoIP provider registered with the FCC that the states alleged was part of a common enterprise with the other defendants. Like the case against Mr. Cox and Mr. Jones, the state AGs' action coincided with the FCC's enforcement activity against Mr. Spiller, which resulted in a $225 million fine.

In addition to filing cases jointly in federal court, states have long collaborated on robocall enforcement more broadly. In 2022, all 51 AGs joined an Anti-Robocall Litigation Task Force, which has remained active in issuing warning letters, and in 2017, the National Association of Attorneys General formed a Robocall Technologies Working Group that developed a set of robocall principles endorsed by all 51 AGs. The AGs also have a long history of coordinating with the FCC and Federal Trade Commission (FTC). The FCC has entered into various Memoranda of Understanding with the state AGs, which encourage information sharing and coordination between state and federal entities, as well as USTelecom's Industry Traceback Group (ITG), an FCC-designated organization that streamlines tracing spoofed robocalls to the originating carrier.

In numerous instances, state AGs have also filed cases jointly with the FTC to address illegal telemarketing. This includes the FTC's first case involving assisting and facilitating claims against VoIP wholesaler, *FTC v. Educare et al.*, which it filed jointly with the Ohio AG.

State AGs Ramp Up Coordinated Targeting of VoIP Wholesalers to Address Illegal Robocalls.

In 2025, the state AG Task Force issued three rounds of warning notices to a total of 50 VoIP wholesalers, with the most recent tranche issued on December 3, 2025. Initially, the warning notices were targeted to companies identified as "gateway" or "point of entry" providers that either directly contracted with robocallers or accepted apparently unlawful robocall traffic from overseas telecommunications companies. Those notices addressed alleged failures to file a certification and robocall mitigation plan, reject call traffic from any voice service provider that is not registered in the FCC's Robocall Mitigation Database, and/or respond to

traceback requests within 24 hours.

The latest letters, however, additionally target companies simply for routing calls transferred to them by other domestic telecom providers. According to the AG task force, the recipients of these latest letters were alleged to have accepted call traffic from illegal callers "indirectly," and the Task Force maintains that the providers should undertake greater efforts to decline such traffic. It is notable that despite allegations of alleged shortcoming, the AG letters do not include suggested actions or compliance measures, outline specific requirements related to such "indirect" traffic, or identify ways for companies to distinguish illegal indirect traffic from lawful indirect traffic. On the whole, the entire series of these letters presents recipients with an ad hoc guessing game about compliance requirements; rather than identifying specific requested actions, the letters typically ask the recipients to respond by identifying additional compliance measures they will take to address the AGs concerns – leaving the companies to guess whether AGs will deem those measures sufficient.

In addition to leaving questions about compliance, these letters also leave questions about what specific law they suspect the recipients may be violating. Indeed, they do not allege that any specific actions by the recipients purportedly violated the TCPA, TICA, TSR, or any specific state laws. Instead, they generally focus on FCC regulatory requirements and responsiveness to traceback requests from the ITG – a regulatory regime the states lack authority to enforce.

Although there is much left unclear from these letters, one thing is clear: The enforcers see VoIP wholesalers as targets for their current efforts to reduce robocall fraud and abuse. Coordinated action across state AG offices and in concert with federal regulators presents a complex enforcement dynamic that merits close attention.

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For more information, please contact one of the authors. Wiley's State Attorneys General, FCC, and FTC and Consumer Protection practices have a deep bench of attorneys experienced in robocall mitigation requirements, state Attorney General investigations and enforcement, and navigating the intersection of state and federal compliance issues.