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# **Guarding the Gateways: Cybersecurity & Robocalls**

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Government Affairs  
August 27, 2025

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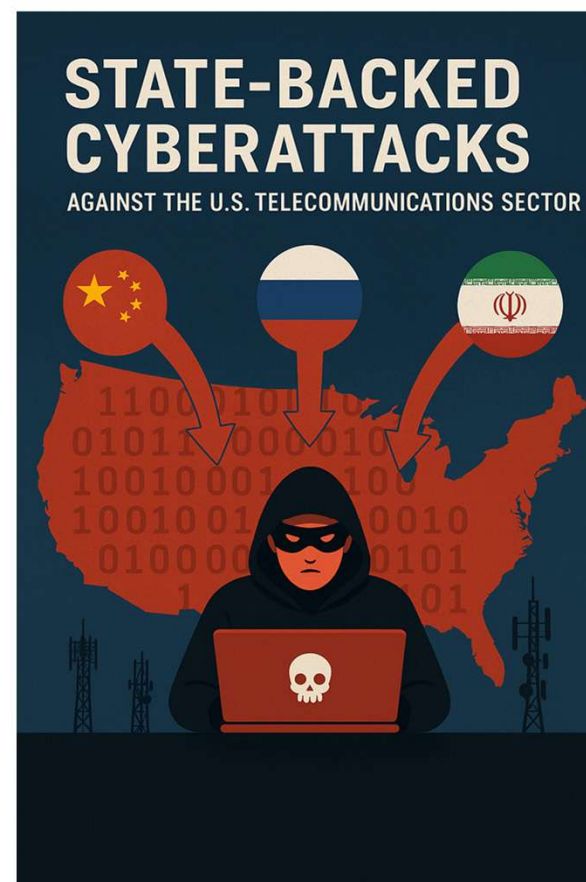
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## Cybersecurity Threat Landscape

- Adversaries target telecom networks: backbone, mobile switching, data centers
- Telecoms are attractive targets because they are both critical infrastructure and information hubs.
- Global cyber damages projected at \$23 trillion annually by 2027 (20% growth each year).<sup>1</sup>
- Compliance consumes up to 70% of cyber resources, leaving less for actual defense.

<sup>1</sup> See The Economist, “Unexpectedly, the cost of big cyber-attacks is falling” (May 17, 2024).

<sup>2</sup> Chamber of Commerce, Briefing with Majority and Minority Staff of Senate Homeland Security and Government Affairs Committee (May 29, 2024).





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## When Hackers Knock, Regulators Answer

- Intrusions are no longer just IT problems — they now trigger direct regulatory action. Providers are likely to see greater regulatory attention and evolving accountability standards.
- Some Congressional and recent FCC actions signal growing momentum to address telecom vulnerabilities — with proposals focused on supply chain scrutiny, stronger network security requirements, and expanded regulatory oversight aimed at safeguarding critical communications infrastructure.

Hearing

Hearing Date: April 2, 2025 10:00 am | HVC-210

### **Salt Typhoon: Securing America's Telecommunications from State-Sponsored Cyber Attacks**

Subject Salt Typhoon: Securing America's Telecommunications from State-Sponsored Cyber Attacks  
Date April 2, 2025  
Time 10:00 am  
Place HVC-210

Military and Foreign Affairs



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## CALEA Declaratory Ruling

- Former Chairwoman Rosenworcel issued a declaratory ruling citing CALEA Section 105 to argue for FCC authority over telecom cybersecurity.
- Like encroaching on private property without a warrant, ISPs could be held liable for “letting intruders in” digitally — meaning any cyber incident could expose providers to lawsuits.
- We (USTelecom & Industry Partners) are positioned to overturn or narrow the ruling through the current NPRM.







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## Cyber Incident Reporting for Critical Infrastructure Act (CIRCIA)

- Without specific thresholds, companies may feel compelled to report too many events, flooding CISA with data and diverting resources from actual cyber defense.
- The current NPRM adds to an existing patchwork of federal, state, and sector-based reporting rules.
- Implementation should be collaborative. CISA should reciprocate by sharing timely defensive advisories and supporting incident response—not just receiving reports.
- Urgent need for ex parte communications or rescission of the 2024 proposed rule.

### CIRCIA TIMELINE



#### March 2022 – Enactment

Cyber Incident Reporting for Critical Infrastructure Act signed into law.



#### 2022–2023 – Initial Development

CISA gathers stakeholder input; issues Requests for Information



#### March 2024 – Proposed Rule Released

Draft rule defines reporting requirements, covered entities, and timelines



#### 2024–2025 – Public Comment & Review

Industry provides feedback; CISA revises framework to address concerns



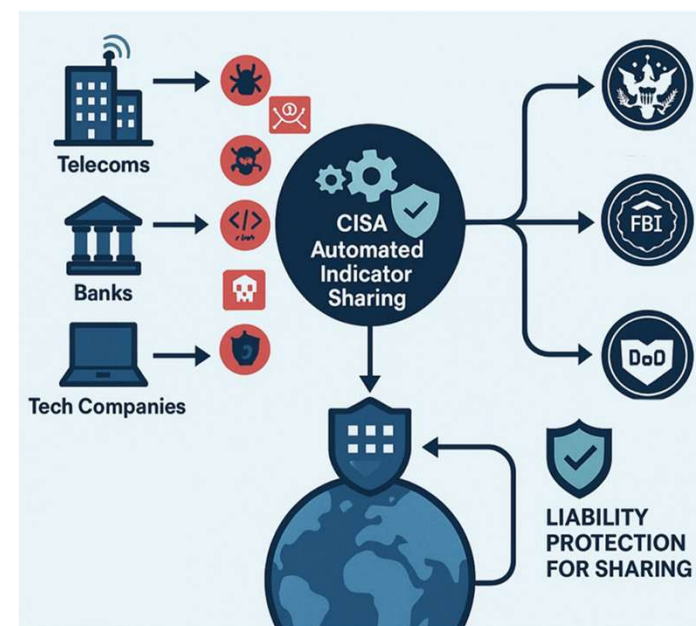
#### October 4, 2025 – Final Rule Expected

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## Cybersecurity Information Sharing Act of 2015

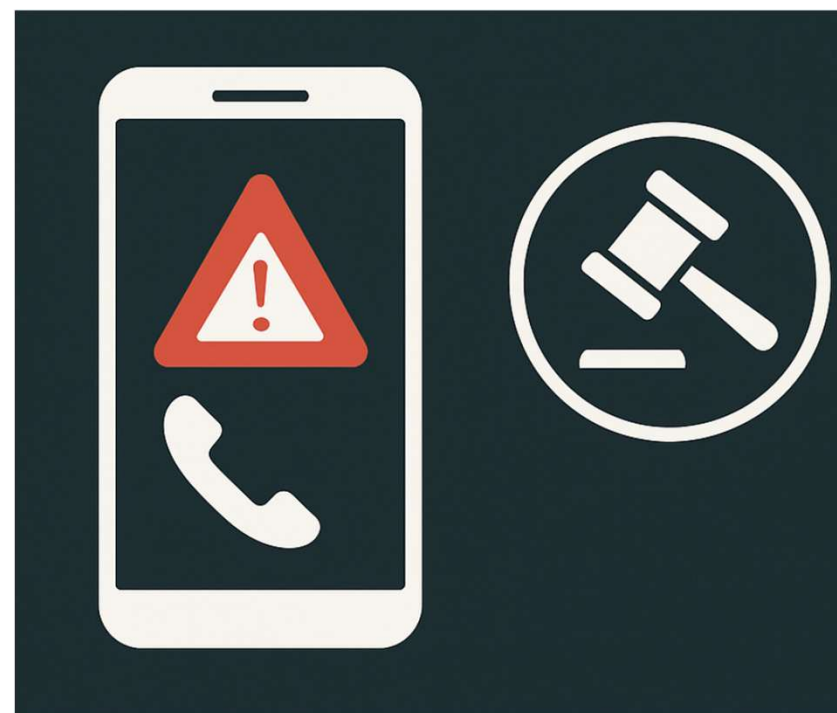
- Established a legal framework for voluntary cyber threat information sharing between industry and government, with liability protections to encourage cooperation.
- September 30th, 2025 sunset
- The CISA vs CISA 2015 dilemma
- Legislative vehicles for reauthorization
- Senate vs House draft text



## When Every Call Feels Like a Scam

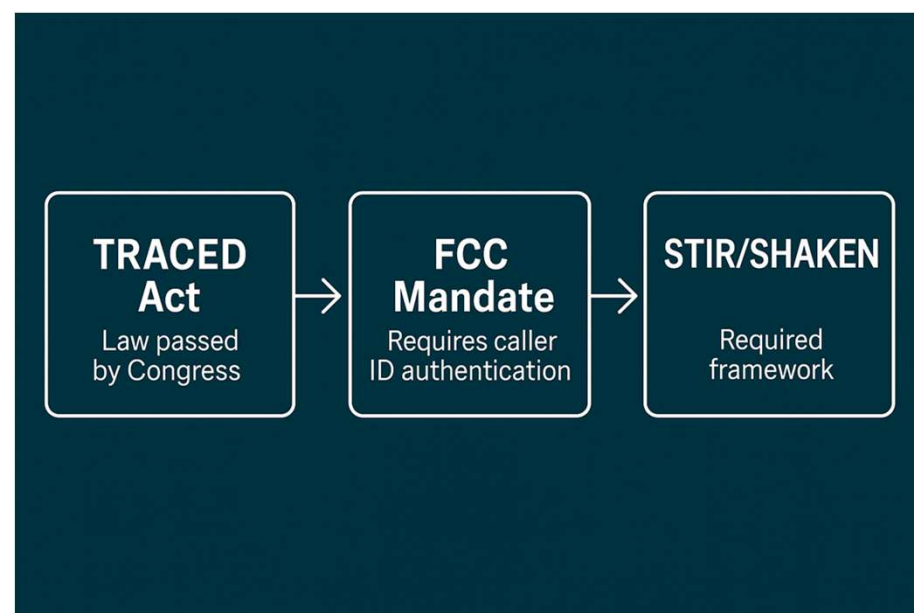
- Trust in voice networks is collapsing — Americans receive 50+ billion robocalls annually, while fraud losses are still climbing 25–30% year-over-year.<sup>3</sup>
- Even when fraud originates with bad actors overseas or through shell companies, regulators and policymakers expect telcos to “clean it up.”
- Fraudsters adapt faster than regulations.
- Regulatory pressure without technical feasibility increases liability risks.

<sup>3</sup>Industry Traceback Group, Private-led Traceback Efforts, 2025.



## From Spoof to Proof: STIR/SHAKEN

- STIR/SHAKEN was a major step forward in authenticating caller ID and reducing spoofed robocalls, but it does not cover non-IP networks or stop more targeted fraud tactics — leaving gaps that criminals continue to exploit.
- We recommend an interimly non-IP solution that meets TRACED Act requirements, leverages interim IP-based tools, aligns with network modernization transition to IP, and ensures compliance without diverting resources away from completing the full IP upgrade.





## Evolving Threats, Persistent Gaps

- Fraudsters exploit overseas carriers beyond FCC jurisdiction; cross-border enforcement remains limited.
- Bad actors create disposable LLCs or impersonate legitimate carriers to slip through know-your-customer rules.
- Privacy and liability concerns limit collaboration between telecoms, banks, and tech platforms that could strengthen fraud prevention.



## Closing the Loopholes

- Accelerate transition from TDM to IP to close authentication gaps.
- Expand traceback participation and resources to quickly identify upstream bad actors and disrupt scam networks.
- Emphasize to Lawmakers that real progress requires prosecution
- Congress should enable responsible data sharing across telecom, financial, and tech sectors to reduce legal barriers for joint fraud prevention efforts.



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# Thank you!

Feel free to reach out for any  
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