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On March 27, 2026, the Federal Communications Commission (FCC) released a Notice of Proposed Rulemaking (Call Center NPRM) seeking comment on a broad package of rules governing foreign call centers. The rulemaking addresses three distinct objectives: encouraging the onshoring of call center operations to the United States; establishing quality and security standards for foreign call center operations that remain; and deterring unlawful robocalls originating from foreign countries through financial mechanisms, such as bonds and fees.

The proposed rules would apply to providers of telecommunications services, commercial mobile radio services (CMRS), interconnected voice over internet protocol (VoIP), cable television, and direct broadcast satellite (DBS) services, as well as their affiliates that provide internet access service. The FCC also seeks comment on extending some or all of these rules more broadly, including all calls covered by the Telephone Consumer Protection Act (TCPA), which could subject a range of commercial entities to new FCC requirements. Companies that use or rely on foreign call centers for customer service, sales or telemarketing should evaluate these proposals and consider participating in the comment process.

Key proposals

Cap on foreign-handled calls

The FCC proposes to limit the percentage of customer service calls that providers may route to or answer at foreign call centers. The NPRM uses 30% as an illustrative threshold and seeks comment on whether this cap should apply separately to inbound and outbound calls or on a combined basis. The FCC asks about the appropriate measurement period (annual, quarterly, monthly or daily) and whether to phase in the cap over time to allow providers to build domestic capacity.

English proficiency requirements

The proposed rules would require providers using offshore call centers to ensure that all calling staff are proficient in both spoken and written American Standard English. The FCC emphasizes that proficiency must extend beyond vocabulary to include understanding of tone, idioms and cultural context. The NPRM seeks comment on which testing regime should apply (referencing the OET, TOEFL and TOEIC as potential models) and whether the FCC should assess compliance per employee or on an aggregate basis. The FCC also asks how these requirements would apply to call centers serving non-English-speaking US customers.

Consumer right to transfer to a US-based representative

Upon consumer request, the proposed rules would require providers to transfer any call that a foreign call center is handling to a representative located in the US. Providers would need to ensure that wait times for transferred calls are no longer than for calls they initially route domestically.

Mandatory disclosure of foreign call center use

The proposed rules would require providers to inform customers at the beginning of each call that a

representative outside the US is handling the call. The FCC proposes specific disclosure language that would include the name of the country where the call center operates and notification of the consumer's right to request transfer to a US-based representative. The disclosure requirement would apply to both inbound and outbound calls.

Sensitive transactions: Domestic-only requirement

The FCC proposes to require that US-based call centers exclusively handle customer interactions involving sensitive data like passwords, multifactor authentication information, Social Security numbers, and bank account or credit card numbers. This requirement would apply regardless of the communication channel used (voice, chat, email or text) and proposes to exclude calls handling sensitive data from any percentage-cap calculation.

Prohibition on call centers in foreign adversary nations

The NPRM proposes to prohibit covered providers from using call centers located in "foreign adversary" nations, as defined under existing Commerce Department regulations. Foreign adversary nations include China, Russia, Iran, North Korea, Cuba and Venezuela. The FCC further seeks comment on an even broader prohibition – barring the use of any call center, wherever located, that employs citizens or residents of a foreign adversary nation. This is a hard prohibition, not a cap.

Broadband label and transparency disclosures

The FCC proposes to amend its broadband consumer label rules to require display of the percentage of customer service calls handled by US-based representatives. For providers of non-broadband services covered by the proposed rules, the FCC asks whether providers should publish comparable information on their websites.

Compliance tracking and reporting

The proposed rules would require providers to track and report to the FCC their compliance with all adopted rules. Reports would cover English proficiency testing results, call volumes by location (domestic versus foreign), transfer rates, wait times and dropped call data. The FCC seeks comment on reporting frequency (monthly, quarterly or annually) and whether the FCC should make compliance reports public.

Extension to nonvoice channels

Beyond the sensitive-transaction requirement (which already extends to all channels), the FCC asks whether all of the proposed rules should apply to nonvoice customer communications, including online chat, text messages, email and video conferencing.

Bond and fee requirements for robocall deterrence

In a separate but related set of proposals, the FCC seeks comment on requiring providers that transmit calls from foreign countries to the US, particularly international gateway providers, to post bonds. The FCC asks detailed questions about bond amounts, drawdown triggers, due process safeguards, replenishment obligations and administration. As an alternative, the FCC also asks about government-imposed fees on unlawful traffic.

Comment dates will be set after publication in the Federal Register. If you have questions about this proceeding or are considering submitting comments, please contact one of the Cooley lawyers listed below.

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