



Regulatory Comment: Improving Customer Service and Protecting Consumers Through Onshoring

THE ISSUE:

On April 23, 2026, the Federal Communications Commission (FCC) published a notice of proposed rulemaking regarding its proposal to require telecommunications providers that use offshore call centers to restrict their usage of such call centers, ensure that staff at those call centers adhere to specific language proficiencies, and limit the types of information that can be taken at those call centers.

IMPACT TO CREDIT UNIONS:

The FCC's proposal could have a major impact on credit unions that employ foreign call centers directly or through vendors, especially regarding the processing of sensitive information. These rules would restrict credit unions' overall usage of foreign call centers and the scope of the calls that they are able to handle. Credit unions and their vendors that employ third-party call centers provided by regulated carriers may see changes in how member calls are handled, including a cap on the percentage of calls handled offshore, required disclosures when the call is answered abroad, and mandatory transfer to a United States-based representative upon customer request. If calls involving sensitive financial information are required to be taken and initiated in the United States, covered providers may need to reroute calls to ensure these transactions never touch offshore personnel. While credit unions that solely or primarily partner with United States-based call centers will not be immediately impacted, telecommunications providers that must comply with this rule may shift compliance costs back onto them.

KEY POINTS:

- The FCC proposes to significantly reduce reliance on foreign call centers to improve customer service, data security, and consumer trust.
- Although credit unions are not directly regulated by the FCC, changes to broadband and communications providers' customer service practices could meaningfully affect the cost, reliability, and responsiveness of services that credit unions rely on to serve their members.

- The proposed rule would expand transparency and accountability obligations across communications providers, including broadband labels and compliance reporting.

ACTION NEEDED: Deadlines and contacts

Please use the comment link below to respond to America's Credit Unions' survey. This will help shape the discussion and better address your needs in our comment letters.

- Comments due to America's Credit Unions by **May 19, 2026** — [Submit here](#).
- Comments due to FCC by **May 26, 2026**
- Questions? Contact [Kristin Rheins](#), Regulatory Advocacy Counsel, America's Credit Unions
- Agency contact: John B. Adams, Special Counsel, Consumer Policy Division, Consumer and Governmental Affairs Bureau, at johnb.adams@fcc.gov

QUESTIONS TO CONSIDER:

1. Do you or any of your vendors employ foreign call centers for member services, collections, IT support, or after-hours assistance?
2. Do the foreign call centers that you utilize have mandatory language standards for their employees? If not, would they need to devote significant financial and logistical resources to meeting the FCC's American Standard English proficiency requirement?
3. Do any of your offshore vendors have access to or handle sensitive financial information such as Social Security numbers (SSNs), passwords, and balance and transaction histories?
4. Can members currently request transfer from offshore to a United States-based representative? If so, what is the typical wait time for these transfers?
5. Do robocalls or other scam calls that originate abroad greatly affect your members? Would the FCC's proposed fee or bond requirements meaningfully reduce these risks?

BACKGROUND:

Over the past few decades, many United States-based corporations have moved their customer service and call centers from America to various foreign countries. While this may streamline

some business operations and reduce overhead costs, the FCC believes offshoring call centers can impede consumer experiences and jeopardize their personal information if handled improperly.

Although individual customer service can vary, FCC consumer surveys show regular dissatisfaction with providers' offshore call operations. The Commission notes that consumers regularly report frustration and poor customer service experiences when they connect with a foreign call center, citing language barriers and regional pronunciations that make it difficult to find a resolution to any given issue.

The Commission has also observed that foreign call centers have failed to protect consumers' sensitive personal information. Because foreign countries may have fewer or different legal protections for consumer data such as financial information and personally identifiable information, American businesses using offshore call centers are regularly putting sensitive information at risk.

By placing restrictions and requirements on providers using offshore call centers, the Commission seeks to encourage the movement of call centers back to the United States to better address communication and consumer data privacy concerns.

SECTION-BY-SECTION ANALYSIS:

A. Proposal Overview

The Commission is seeking public comments on actions that would encourage and facilitate the onshoring of foreign call centers and steps it can take to improve customer service and security of foreign communications. Further, the FCC is also looking to extend protections to alternative modes of customer service communications other than calls, such as email, text, and on-line chat, and on ideas to deter scam and other unlawful calls made to the United States from foreign countries.

B. Proposed Requirements

1. Transparency:

The Commission would require covered providers to publicly disclose information regarding network management practices, performance characteristics, and commercial terms of their broadband internet access services. Further, it would require providers to share the percentage of calls handled by customer service representatives within the United States. These disclosures

would need to be made publicly available and easily accessible, as determined by the Commission.

Under this proposal, credit unions would not be directly subject to the Commission's amendments but may face downstream effects through their broadband providers and any carrier-affiliated vendors. For example, if providers must make public disclosures, credit unions may be asked about those metrics in vendor selection, due diligence, board reporting, and other reputation-related reports. Members dealing with offshore representatives at a provider used by a credit union may use the provider's public disclosures to attribute poor experiences to offshoring. Additionally, to avoid reputational damage, covered providers may begin onshoring their operations which could lead to contract renegotiations and price increases.

2. Language Proficiency Standards and Foreign Call Caps

According to the Commission, Direct Broadcast Satellite (DBS) and other telecommunications providers are subject to public interest obligations that require them to address the needs and problems of their local communities. In this case, the Commission would require covered providers to ensure that their customer service representatives located outside of the United States are proficient in spoken and written American Standard English and that no more than a to-be-determined percentage of calls are handled by those representatives.

Further, the Commission would require offshore representatives to inform customers at the beginning of each call that their call is being handled outside of the United States and that the customer has the right to have the call transferred to a representative in the United States. The Commission also proposes that those calls, if transferred to a United States-based representative, have wait times no longer than those for calls routed directly to a customer service agent located in the United States.

Although credit unions would not be directly impacted by the Commission's proposal, vendors that employ foreign customer service representatives are likely to incur the costs associated with meeting the Commission's requirements, some of which may be shifted to credit unions. Covered providers would need to ensure their offshore employees meet the American Standard English proficiency requirements put forth by the Commission by increasing training and testing. Providers may also need to re-balance staffing to accommodate the offshore cap imposed by the Commission and reroute more calls to representatives in the United States. This could result in changes to availability and disrupted continuity for members during these transitions. Credit unions that use call centers based in the United States could also face price increases if their providers incur new costs while working to meet the Commission's requirements.

3. Heightened Protection for Sensitive Information

The Commission is also considering placing restrictions on the kind of information allowed to be handled by foreign customer service employees. Under the proposal, calls and other communications facilitated by email, text message, or online chat that involve access to or transmission of sensitive customer information, account information, or financial information must be handled by customer service representatives located within the United States. This includes passwords, password reset procedures, multi-factor authentication codes, social security numbers, bank account numbers, or credit card numbers. The Commission also proposes to prohibit covered providers from using call centers located in “foreign adversary” nations, as defined by the Commission in 15 CFR § 791.2 and identified in 15 CFR § 791.4.

For credit unions, these limitations would require that many high-volume, member-facing service interactions be handled by United States-based personnel, even if the initial contact is routed to an offshore representative. As a result, credit unions and their covered providers or carrier-affiliated vendors may need to redesign call and digital support workflows to prevent offshore agents from accessing or receiving restricted data, including earlier transfers to domestic staff, tighter controls, and revised scripts that prohibit collecting sensitive information. These operational changes could increase transfer volume and wait times, complicate after-hours coverage, and raise vendor costs that may be passed through to credit unions.

4. Authority for Fee or Bond Solutions

The Commission has observed that scam calls originating abroad are increasingly detrimental to consumers, resulting in millions of dollars lost each year. Consequently, the Commission seeks comment on whether it should use government-imposed fees or bond requirements to make illegal calls expensive enough to deter them in the first place.

If the Commission were to adopt a fee or bond-based solution, it could potentially reduce the number of scam calls targeting members that originate from foreign countries. However, covered providers may respond by more aggressively blocking calls before they reach members, which can impede legitimate outbound credit union calls that alert members of collections, fraud alerts, and appointment reminders. Although credit unions would not be directly impacted by a fee or bond-based deterrent, covered providers may impose tighter onboarding and screening requirements on their customers. This could result in increased compliance costs and operational friction that are ultimately passed through to vendors and credit unions.