United States Senate

WASHINGTON, DC 20510

September 24, 2026

Brendan Carr
Chairman
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Subject: *Notice of Proposed Rulemaking – CG Docket Nos. 26-52, Improving Customer Service and Protecting Consumers through Onshoring*

Dear Chairman Carr,

As the bipartisan Senate sponsors of the *Keep Call Centers in America Act of 2025*, we are pleased by the Federal Communications Commission (FCC)'s meaningful efforts to address offshoring in the call center industry. We thank you for attention to this important topic, and we write to share additional commentary.

Starting in the mid-1990s, many companies shifted customer service operations overseas to low-wage countries and increasingly automated front-line United States-based agents. Across the communities that we represent in Arizona and West Virginia, workers, consumers, and American families experienced harms. Absent reform, the U.S. Bureau of Labor Statistics (BLS) projects an additional loss of 150,000 United States-based call center jobs by 2033.[1] As such, it is no surprise that reshoring call centers is a bipartisan issue that has garnered support from stakeholders across the political spectrum, from organized labor[2] to America First conservatives.[3]

Specifically, we wish to provide comments on four aspects of the Notice of Proposed Rulemaking (NPRM):

- **<u>Disclosure of Foreign-Based Call Center Operations and Right to Transfer</u>.** The *Keep Call Centers in America Act of 2025* (S.2495/H.R.4954) requires call centers to disclose to consumers the country in which the agent is located. It also gives consumers the right to be transferred to a human agent located in the United States. We strongly support the NPRM's similar requirement. We believe that consumers should be able to quickly opt to speak to a human representative in the United States and be immediately transferred. In the final rule, we also urge the Commission to create standard, specific text for providers to use in their disclosure and set standards to assist providers with compliance.

  A disclosure and right to transfer requirement would offer numerous workforce, consumer, and supply chain resiliency benefits. Most call center offshoring occurs in the Philippines, where workers have long faced repression, poverty-level wages, and even

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[1] https://www.newsnationnow.com/business/your-money/10-jobs-set-to-shrink/

[2] https://waysandmeans.house.gov/wp-content/uploads/2026/01/Dan-Mauer-Written-Testimony.pdf

[3] https://aflegal.org/press-release/america-first-legal-backs-the-trump-administrations-effort-to-limit-foreign-call-centers-and-make-customer-service-great-again/

government-sanctioned violence.[4] These low workplace standards place both American workers and American companies offering high standards at a disadvantage, contributing to American job losses. Indeed, a survey from 2020 found that close to 80 percent of workers felt that it was likely that there would be layoffs at their call centers associated with outsourcing, offshoring, and company downsizing or restructuring.[5] A right-to-transfer requirement would provide a market-driven mechanism to incentivize onshoring.

Onshoring call centers would also provide significant consumer benefits. Our constituencies affirm that American consumers often wish to speak to other Americans with whom they can directly relate to help them solve problems. This local, human contact is more important than ever, especially when a customer needs help receiving a refund, booking a flight, or addressing a bank issue that could determine whether he or she has the funds necessary to pay rent or see a sick family member.

Finally, incentivizing domestic capacity build up is critical for supply chain resiliency. The hub of the offshore business process outsourcing (BPO) industry, the Philippines, is a geographically precarious location. The country faces significant risks of volcanic activity, typhoons, and other natural disasters, any of which could significantly disrupt global economic activity should they occur. As we have seen from the pandemic, over-reliance on any one country for any product or service can spike prices, cause shortages, and depress economic activity. The BPO supply chain is not immune to these potential issues.

- **Use of Machine-Based Systems for Customer Service.** In our legislation, we propose an additional right-to-transfer requirement for call centers using artificial intelligence (AI)/machine-based systems to speak to consumers. A recent surveys found that 77 percent of Americans are frustrated by automated systems during customer service interactions.[6] Additionally, a staggering 93 percent of consumers prefer interacting with a human over AI.[7] If a call center operator implements AI-use in a helpful way—*e.g.*, empowering employees to utilize AI to more efficiently resolve a customer's issue—workers and consumers can reap the benefits of AI. However, pushing customers to speak with machine systems and using AI to monitor or displace workers is harmful. We encourage the Commission to build on the spirit of this NPRM and consider a right-to-transfer requirement similar to what we propose in our legislation.

- **Onshoring Call Centers Handling Americans' Sensitive Information.** Americans often must share sensitive data like passwords, bank and credit card information, multi-factor authentication information, protected health information, and even social security numbers during consumer service calls. Therefore, we unequivocally support the NPRM's proposal allowing only United States-based call centers to handle inquiries that involve customers' sensitive personal information due to potential risks and enforcement difficulty associated with offshore operations. This is a common-sense proposal that

[4] https://waysandmeans.house.gov/wp-content/uploads/2026/01/Dan-Mauer-Written-Testimony.pdf
[5] https://ecommons.cornell.edu/bitstream/handle/1813/74307/Doellgast28_Making_call_center_jobs_better.pdf
[6] https://www.filesforprogress.org/datasets/2025/4/dfp_gwc_consumer_pain_points_tabs.pdf
[7] https://kinsta.com/blog/ai-vs-human-customer-service/

would do well to safeguard Americans' sensitive information and prevent it from being shared over the phone to a call center in a foreign country.

- **Determining Costs and Benefits:** The Commission asks for feedback regarding the determination of the NPRM's costs and benefits. To determine costs and benefits, it is important not only to compare wages between the United States and offshore destinations but also to take a holistic and long-term view. Simply comparing hourly wage rates for onshore versus offshore workers provides an incomplete picture without factoring in productivity increases associated with onshore operations. Onshore operations have lower average handle times.[8] These operations also have less agent attrition.[9] Many offshore call centers simply function as so-called "ticket mills" because offshore, outsourced operators are not empowered to quickly solve consumer issues. Unfortunately, absent federal policy change, our current economic incentives reward short-term thinking to the detriment of the consumer.

  When analyzing economic benefits, we urge the FCC to also consider the substantial economic benefits for communities. The case of Provalus, a company onshoring call center and customer service operations in rural America,[10] offers important insight. The company cites numerous positive spillover effects associated with their domestic investments.[11] For example, 10 new Main Street small businesses opened in the 5,000-person town of Brewton, Alabama, since the arrival of the call center, creating additional jobs in the community.[12] Additionally, domestic call center jobs support sustained tax revenue since customer service roles often serve both as entry level jobs that prepare workers for middle-class professions[13] and as careers for those who are no longer able to perform physically demanding tasks, including veterans.[14] We urge the Commission to keep these benefits in mind as the FCC finalizes the rule.

After decades of offshoring, lost jobs, and declining customer service, we thank you for your attention to this important matter affecting workers, consumers, and our country's security.

Sincerely,

Ruben Gallego
United States Senator

James C. Justice
United States Senator

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[8] https://www.globalresponse.com/blog/onshore-offshore-nearshore-call-centers/

[9] https://callforce.global/blog/call-center-attrition/

[10] https://www.wsj.com/economy/jobs/these-jobs-often-go-overseas-one-company-is-bringing-them-to-rural-america-127f110c?mod=economy_lead_story

[11] https://www.provalus.com/blog/bringing-tech-careers-to-rural-america-creates-outsized-economic-returns-for-both-companies-and-communities

[12] https://www.foxbusiness.com/economy/how-one-company-transforming-rural-communities-tech-careers

[13] https://www.wsj.com/economy/phoenix-built-an-empire-of-cubicle-jobs-ai-is-coming-to-tear-it-down-fb64bb68

[14] https://www.wsj.com/economy/jobs/these-jobs-often-go-overseas-one-company-is-bringing-them-to-rural-america-127f110c