



April 21, 2026

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Improving Customer Service and Consumer Protection, CG Docket Nos. 26-52, 17-59, 02-278

Dear Ms. Dortch:

On behalf of the National Retail Federation (NRF), I write to express serious concerns with the Federal Communications Commission's (FCC or "the Commission") Notice of Proposed Rulemaking, *Improving Customer Service and Consumer Protection*. NRF appreciates the Commission's interest in improving customer service and combating fraud. Although the proposal is directed primarily at FCC-regulated communications providers, NRF is concerned about the broader policy direction reflected in this proposal and the risk that the framework could extend to retail customer service operations.

The National Retail Federation passionately advocates for the people, brands, policies, and ideas that help retail succeed. From its headquarters in Washington, D.C., NRF empowers the industry that powers the economy. Retail is the nation's largest private-sector employer, contributing \$5.3 trillion to annual GDP and supporting more than one in four U.S. jobs—55 million working Americans. For over a century, NRF has been a voice for every retailer and every retail job, educating, inspiring, and communicating the powerful impact retail has on local communities and global economies.

For retailers, customer experience sits at the center of every decision we make. It shapes how we design our service models, where we invest in technology, and how we recruit, train, and develop our workforce. Over the past several years, customer expectations have shifted dramatically, driven in large part by the rapid acceleration of e-commerce during and after the COVID-19 pandemic. During that period of extraordinary workforce disruption, many retailers expanded their use of global support partners so customers could continue to receive timely assistance when they needed it most.

As conditions have stabilized, retailers have shifted from scaling capacity to improving the quality, consistency, and efficiency of the customer experience. Companies have made significant investments in digital capabilities, self-service options, and AI-enabled tools that allow many issues to be resolved faster and with less customer effort. At the same time, strong continuous improvement practices allow retailers to identify and address problems at their source, often reducing the need for customer contact altogether. Together, these changes are reshaping modern customer service, with a growing share of interactions resolved through digital and automated channels.

As a result, reliance on traditional labor-intensive models is declining, not because of regulation, but because technology and proactive service are meeting customer needs earlier and more effectively. This evolution allows human expertise to focus on complex problem-solving and higher-value interactions. In turn, these changes support career advancement and meaningful wage growth.

Retailers have also proactively addressed customer experience concerns often raised in policy discussions. Investments in voice clarity tools, including dialect and noise reduction technology, have significantly improved communication quality and customer satisfaction. Retailers are enhancing service quality regardless of the geographic location of a customer service representative.

Retailers take seriously their obligation to maintain high levels of customer service. Many NRF members rely on hybrid service models that combine U.S.-based teams with global support partners to ensure reliable coverage across all U.S. time zones. These systems provide surge capacity during high-volume shopping periods such as holidays and promotions and meet the language-access needs of diverse consumer populations.

The Commission's proposed approach would undermine the extensive efforts described above. The NPRM proceeds from a premise that offshore customer service operations are inherently problematic. Again, for retail customer care, quality, privacy, and security can all be achieved no matter the location of the customer service representative. Retailers already operate under extensive consumer-protection and data-security requirements. NRF members impose rigorous standards on vendors through contracts, audits, monitoring, and performance metrics. A rule that treats offshore operations as presumptively suspect risks curtailing or eliminating well-functioning systems that are already subject to substantial oversight.

The caps, disclosures, and transfer requirements included in the NPRM would only harm, not help, consumers by increasing wait times and reducing service efficiency. A mandated right to transfer to a U.S.-based representative, combined with limits on offshore handling, would likely create operational bottlenecks, longer queues, higher abandonment rates, and duplicative handling of the same customer issue. The Commission should be cautious about requirements that drive costs up and service levels down at a time when households remain sensitive to price increases.

The proposal further threatens multilingual service and accessibility for non-English-speaking consumers. Retail serves diverse communities nationwide, and language access is a core feature of effective customer care. Prescriptive "American Standard English" requirements and restrictions on global staffing could reduce retailers' ability to deliver fast, accurate support for consumers who prefer languages other than English. Policies that narrow these capabilities risk excluding large segments of the public and undermining basic expectations for accessible service.

In addition, the NPRM creates strong incentives to accelerate automation in ways that could ultimately diminish human job opportunities. Significantly increasing the cost of customer service operations is likely to push companies more rapidly toward automation. A policy intended to preserve domestic jobs could therefore have the opposite effect by hastening transitions that reduce human roles over time.

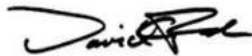
The Commission should also carefully consider its statutory authority and the precedent this proceeding would set. Decisions about how customer service is staffed and delivered are core business operations. Attempting to regulate existing service models risks exceeding the Commission's traditional role and could create a template for broader regulatory expansion by other agencies or future administrations, with negative consequences for businesses, consumers, and the economy alike.

NRF is further concerned by the Commission's questions about extending these requirements beyond voice communications to other customer service channels such as online chat, email, and messaging. Retailers depend on these channels to serve consumers efficiently, particularly during peak demand, and additional restrictions would further erode flexibility and responsiveness.

In sum, the NPRM adopts a short-sighted approach that would raise costs, reduce flexibility, and risk worse outcomes for consumers without a clear demonstration of corresponding benefits. For these reasons, NRF urges the Commission to reconsider this approach and instead support policies that encourage innovation, continuous improvement, and workforce development while preserving flexibility in how high-quality customer service is delivered.

Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David French".

David French
Executive Vice President
Government Relations