

Reassigned Number Database is Dominating TCPA Litigations

A Quick Refresh: What is the Reassigned Numbers Database (RND)?

The RND was introduced by the Federal Communications Commission (FCC) in response to a common issue—calls or texts reaching the wrong recipient after a number has changed hands. Prior to the RND, businesses had no reliable way to identify whether a phone number had been permanently disconnected or reassigned to a new person. This created massive risk under the Telephone Consumer Protection Act (TCPA), especially when businesses continued to contact individuals who had not provided prior express consent.

The RND officially launched in November 2021 and is managed by the FCC's Reassigned Numbers Database Administrator, accessible at www.reassigned.us. Carriers are required to report permanently disconnected numbers, and businesses are required to scrub their calling and texting lists against the RND monthly to avoid calling reassigned numbers.

Failing to use the Reassigned Numbers Database may be one of the fastest ways to end up in court.

Why it Matters in 2025

TCPA litigation is surging. According to recent data, there were 1543 TCPA lawsuits filed in the first seven months of 2025 alone—a 44% increase YoY. Even more alarming: 1172 of these lawsuits are class actions (a YoY increase of 76%), often targeting companies that failed to take simple compliance measures like scrubbing the RND.

“Professional plaintiffs” (a.k.a. known litigators) are gaming the system by acquiring recently disconnected phone numbers to trap unsuspecting marketers. Our team has encountered cases where a single litigant registered dozens of disconnected numbers to bait outbound calls.

And it's working—because too many companies still aren't scrubbing the database. In 18 months, every case brought before our sister company CompliancePoint's Litigation Support Services for consultation has been related to the RND. That's right—100% of cases in the past 18 months, after years of broad TCPA-related casework.

Common Challenges and Misconceptions

One of the biggest challenges stems from the fact that there is no publicly available list of users and their cell numbers, unlike landline 411, who will list the phone number, address, and person who is the subscriber of a land line. Cell phones typically have one main “subscriber” - for instance, the head of the family. But the names of their spouse, kids, or any other users of phones under the subscriber plan are still unknown publicly, and aren't tied to their phone numbers.

Because of this, even today the RND contains no names or addresses. It only contains dates of permanent disconnect and telephone numbers.

Anyone scrubbing against it must have a procedure to make sure those numbers are not called again. They'll have no names, no addresses, but only date and phone number. There's no way to determine who disconnected it or who it was reassigned to. The onus is on the company to compare the permanent disconnect date and the date they received the number and consent from a customer or lead provider.

Another common pitfall is relying on a data append/enrichment service. While these services can provide value for marketers, using an append, update or data validation process from a private company is not sanctioned by the FCC as a due diligence measure related to Reassigned Numbers and does not create a defensible position.

Safe Harbor Protection

Critically, complying with the requirement to scrub the RND monthly offers a Safe Harbor to companies who can show proof they scrub regularly. The FCC allows for Safe Harbor for companies that check a number, receive a response that the number is callable, and an error is made.

Companies should exercise risk mitigation and show an attempt to comply by implementing the RND standard on a regular basis (at least monthly) and keep records of that activity.

Your Next Step: Implement RND Scrubbing - Now.

[Speak to an expert](#)

Ready to Reduce Risk?

If you're not already using the RND, now is the time to start. The FCC offers access via subscription at www.reassigned.us, with pricing based on your monthly volume.

But you don't have to go it alone. PossibleNOW can help integrate automated RND scrubbing into your broader compliance process—alongside Known Litigator scrubbing, DNC lists, EBR exemptions, wireless identification, and express consent tracking. Even better, you'll receive verifiable proof of compliance.

Let us help you implement RND scrubbing today. With TCPA lawsuits on the rise and plaintiffs actively targeting companies who haven't adapted, the time for action is now.

PossibleNOW: Marketing Compliance Made Simple

PossibleNOW is the pioneer and leader in customer contact compliance. From federal and state regulations to international laws, our platform **DNCsolution** consolidates everything a business needs to stay compliant with regulations such as Do Not Call, TCPA, CAN-SPAM, and Reassigned Numbers Database. We back our solutions with a 100% compliance guarantee and keep companies out of the crosshairs of professional litigators.

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