

In the Matter of )  
 )  
Global UC Inc ) EB-TCD-22-00034406  
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**Released: November 22, 2022**

13376

providers that received an extension were required to implement a robocall mitigation program to prevent unlawful robocalls from originating on their networks.<sup>6</sup> Furthermore, all voice service providers—not only those granted an extension—were required to file certifications with the Commission stating whether their traffic is authenticated with STIR/SHAKEN or, alternatively, is subject to a robocall mitigation program.<sup>7</sup> Voice service providers whose traffic is subject to a robocall mitigation program must detail in their certifications the specific reasonable steps that they have taken to avoid originating illegal robocall traffic.<sup>8</sup> These certifications and robocall mitigation plans are publicly available in the Robocall Mitigation Database.<sup>9</sup>

3. Commission rules prohibit any intermediate provider or terminating voice service provider from accepting voice traffic directly from any originating voice service provider that does not appear in the Robocall Mitigation Database.<sup>10</sup> The Enforcement Bureau may take enforcement action, including removal of a certification from the Robocall Mitigation Database, against voice service providers that have deficient certifications.<sup>11</sup> A deficient certification includes one that fails to describe specific robocall mitigation steps as required by section 64.6305(a) of the Commission's rules.<sup>12</sup> Prior to removing a certification from the Robocall Mitigation Database, the Enforcement Bureau must provide notice to the originating voice service provider and allow an opportunity to cure.<sup>13</sup>

#### **B. Global UC's Deficient Certification**

4. Global UC filed a Robocall Mitigation Database certification on July 1, 2021.<sup>14</sup> Global UC certified that it had implemented the STIR/SHAKEN framework on part of its network, and that the remainder of the calls originating on its network were subject to a robocall mitigation program.<sup>15</sup> The Company's certification did not include any specific reasonable steps that it was taking to avoid

<sup>6</sup> TRACED Act § 4(b)(5)(C)(i); 47 CFR § 64.6305(a)(1); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1897-98, para. 75.

<sup>7</sup> 47 CFR § 64.6305(c)(1); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, para. 82. This obligation was formerly codified at section 64.6305(b). The Commission has also adopted rules applying this requirement to traffic from gateway providers, which will go into effect 90 days following the deadline for gateway providers to submit a certification to the Robocall Mitigation Database. *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Sixth Report and Order in CG Docket No. 17-59, Fifth Report and Order in WC Docket No. 17-97, Order on Reconsideration in WC Docket No. 17-97, Order, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, and Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, FCC 22-37, paras. 34, 131 (2022) (*Gateway Provider Order*); 47 CFR § 64.6305(e)(3).

<sup>8</sup> 47 CFR § 64.6305(c)(2)(ii); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, para. 82 (quotations omitted).

<sup>9</sup> FCC, Robocall Mitigation Database, FCC, [https://fccprod.servicenowservices.com/rmd?id=rmd\\_welcome](https://fccprod.servicenowservices.com/rmd?id=rmd_welcome) (last visited Oct. 1, 2021).

<sup>10</sup> 47 CFR § 64.6305(e); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1904, para. 86.

<sup>11</sup> *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, 1903, paras. 81 n.322, 83.

<sup>12</sup> 47 CFR § 64.6305(c)(2)(ii); see also *Second Caller ID Authentication Order*, 36 FCC Rcd at 1900-02, paras. 77-82.

<sup>13</sup> *Second Call Authentication Trust Anchor Order*, 36 FCC Rcd at 1904-05, para. 88. We may take other enforcement actions such as requiring the voice service provider to submit more specific robocall mitigation measures or imposing a forfeiture. *Id.* at 1903, para. 83.

<sup>14</sup> Global UC Inc, Robocall Mitigation Database, FCC (July 24, 2021), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=b30aaf861b0178107ccf20ecac4bcb73&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=b30aaf861b0178107ccf20ecac4bcb73&view=sp) (Robocall Mitigation Database Filing).

<sup>15</sup> *Id.*

origination of illegal robocall traffic. Instead, it only included a document that described background technical information about STIR/SHAKEN; the information was unrelated to the Company and did not include a description of the Company's robocall mitigation plan.<sup>16</sup> The FCC's Wireline Competition Bureau contacted the Company on October 19, 2021, via the e-mail listed in its certification. The Wireline Competition Bureau notified the Company that the attached description of its robocall mitigation program submitted with the certification did not satisfy the requirements under the Commission's rules.<sup>17</sup> The Wireline Competition Bureau did not receive a response from Global UC acknowledging or addressing the notice, and Global UC did not correct its certification.

5. The Enforcement Bureau released an Order on October 3, 2022, requiring Global UC to demonstrate why the Enforcement Bureau should not remove Global UC's certification from the Robocall Mitigation Database.<sup>18</sup> The Order notified the Company that it was required to cure the deficiencies in its robocall mitigation program or submit an explanation as to why the certification was not deficient and imposed a deadline for response of October 18, 2022. Global UC responded to the Enforcement Bureau on October 3, 2022, stating that "We are not needing this certification."<sup>19</sup> It offered no explanation for why it believed that it was not required to submit a compliant certification. The response further asked how to remove Global UC's certification from the Robocall Mitigation Database.<sup>20</sup> In response, Enforcement Bureau staff directed Global UC to the Robocall Mitigation Database filing instructions.<sup>21</sup> To date, Global UC has neither removed its certification nor corrected the deficiencies.

### III. DISCUSSION

6. We find that Global UC has filed a deficient Robocall Mitigation Database certification. The Company certified that it is subject to a robocall mitigation program,<sup>22</sup> but it failed to describe specific reasonable steps that the Company is taking to prevent the origination of illegal robocall traffic.<sup>23</sup> Instead, it only attached a document providing background technical information about STIR/SHAKEN; the information was unrelated to the Company and did not include a description of the Company's robocall mitigation plan.<sup>24</sup> The Company's certification therefore was deficient because it did not describe any robocall mitigation program.<sup>25</sup>

7. Global UC did not take any corrective action after the Wireline Competition Bureau and the Enforcement Bureau, separately, informed Global UC of the deficiencies in its certification.<sup>26</sup> Global UC claimed, without further explanation or action, that it no longer needed a certification in the Robocall

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<sup>16</sup> *Id.*; see *Global UC Inc*, Order, DA 22-1037, para. 5 (EB Oct. 3 2022).

<sup>17</sup> E-mail from Wireline Competition Bureau to Global UC Inc (Oct. 19, 2021) (Warning Notice).

<sup>18</sup> *Global UC Inc*, Order, DA 22-1037, paras. 6-7 (EB Oct. 3, 2022).

<sup>19</sup> E-mail from Ricky Perez, Global UC Inc to Daniel Stepanicich, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau (Oct. 3, 2022 15:27 EDT) (Global UC Response).

<sup>20</sup> *Id.*

<sup>21</sup> E-mail from Daniel Stepanicich, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau to Ricky Perez, Global UC Inc (Oct 3, 2022 17:03 EDT).

<sup>22</sup> See Robocall Mitigation Database Filing (attesting that the Company has partial STIR/SHAKEN implementation and is performing robocall mitigation).

<sup>23</sup> See 47 CFR § 64.6305(a); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, para. 82.

<sup>24</sup> Robocall Mitigation Database Filing.

<sup>25</sup> See 47 CFR § 64.6305(c)(2)(ii) (requiring voice service providers subject to a robocall mitigation program to provide the specific reasonable robocall mitigation steps taken).

<sup>26</sup> See Warning Notice; Wireline Bureau Referral; *Global UC Inc*, Order, DA 22-1037, paras. 6-7 (EB Oct. 3, 2022).

Mitigation Database.<sup>27</sup> We therefore conclude that Global UC's Robocall Mitigation Database certification is deficient.

8. Accordingly, we remove Global UC's certification from the Robocall Mitigation Database. **All intermediate providers and terminating voice service providers must cease accepting traffic from Global UC within two (2) business days of this Order.**<sup>28</sup> Downstream providers may not block 911 calls and must take reasonable efforts not to block calls from public safety answering points (PSAPs) and government emergency numbers.<sup>29</sup> Global UC shall not refile unless the Wireline Competition Bureau and the Enforcement Bureau determine that Global UC has addressed and resolved any deficiencies or shortcomings in its Robocall Mitigation Database certification.

9. *Additional Information.* For further information about this Order, contact Daniel Stepanicich, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, at [daniel.stepanicich@fcc.gov](mailto:daniel.stepanicich@fcc.gov) or (202) 418-7451.

#### IV. ORDERING CLAUSES

10. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227b, 251(e), and 403 of the Communications Act of 1934, as amended, sections 0.111, 0.311, 1.102(b)(1), and 64.6305 of the Commission's rules,<sup>30</sup> and the *Second Caller ID Authentication Order*,<sup>31</sup> Global UC is **IMMEDIATELY REMOVED** from the Robocall Mitigation Database.

11. **IT IS ORDERED** that Global UC shall not refile until the Wireline Competition Bureau and the Enforcement Bureau determine that Global UC has addressed and resolved any deficiencies or shortcomings in its Robocall Mitigation Database certification.

12. **IT IS FURTHER ORDERED** that copies of this Order shall be sent by email and registered mail, return receipt requested, to: Ricky Perez, Manager, Global UC Inc, 4613 Aspen Way, Fort Worth, TX 76137 and [rick@globaltelelinks.com](mailto:rick@globaltelelinks.com).

FEDERAL COMMUNICATIONS COMMISSION

Loyaan A. Egal  
Chief  
Enforcement Bureau

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<sup>27</sup> Global UC Response.

<sup>28</sup> 47 CFR § 64.6305(e)(1); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1904, para. 86.

<sup>29</sup> 47 CFR § 64.6305(e)(4).

<sup>30</sup> 47 U.S.C. §§ 4(i), 4(j), 227b, 251(e), 403; 47 CFR §§ 0.111, 0.311, 1.102(b)(1), 64.6305.

<sup>31</sup> *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, 1903, paras. 81 n.322, 83.