



PUBLIC NOTICE

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OCTOBER 2022 ROBOCALL MITIGATION DATABASE COMPLIANCE/REMOVAL ACTIONS

FCC Enforcement Bureau Provides a Compliance Update on Providers that Received Robocall Mitigation Database Removal Orders

EB-TCD-22-00034406

By the Chief, Enforcement Bureau:

The Enforcement Bureau of the Federal Communications Commission (FCC or Commission) issues this Public Notice to notify all U.S.-based voice service providers that it will remove Global UC Inc's (Global UC) certification as described in DA 22-1219.¹ **All intermediate providers and terminating voice service providers must immediately cease accepting traffic from Global UC Inc within two (2) business days.**²

The Enforcement Bureau has reviewed submissions from the following companies and will not remove them from the Robocall Mitigation Database at this time while it continues to assess their certifications: Akabis, LLC (Akabis); Cloud4 Inc (Cloud4); Horizon Technology Group LLC (Horizon Technology Group); Morse Communications Inc (Morse Communications); Sharon Telephone Company; and Southwest Arkansas Telecommunications and Technology, Inc (SW Arkansas Telecommunications and Technology).

I. BACKGROUND

All originating and terminating voice service providers must file certifications with the Commission, stating whether their traffic is authenticated with STIR/SHAKEN or, alternatively, is subject to a robocall mitigation program.³ 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

¹ *Global UC Inc*, Removal Order, DA 22-1219 (EB Nov. 22, 2022).

² 47 CFR § 64.6305(e)(1); *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1904, para. 86 (2020) (*Second Caller ID Authentication Order*).

³ 47 CFR § 64.6305(c); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, para. 82. STIR/SHAKEN stands for Secure Telephony Identity Revisited/Signature-based Handling of Asserted Information using toKENs, and represents a method for authenticating traffic to verify that a call is coming from the number shown on caller ID. The Commission has extended this requirement to 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, para. 34 (2022) (*Gateway Provider Order*); 47 CFR § 64.6302(c).

illegal robocall traffic.⁴ The certifications and robocall mitigation plans are publicly available in the Robocall Mitigation Database.⁵

Commission rules prohibit any intermediate provider or terminating voice service provider from accepting voice traffic directly from any voice service provider that does not appear in the Robocall Mitigation Database.⁶ 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.⁷ A deficient certification includes one that fails to describe specific robocall mitigation steps as required by section 64.6305(c) of the Commission's rules.⁸

On October 3, 2022, the Enforcement Bureau released orders to Akabis, Cloud4, Horizon Technology Group, Global UC, Morse Communications, Sharon Telephone Company, and SW Arkansas Telecommunications and Technology for deficient Robocall Mitigation Database certifications.⁹ The orders required each company to cure its deficient certification or explain why the certifications were not deficient. The companies had until October 18, 2022, to address the deficiencies.

II. STATUS OF CERTIFICATION REMOVAL

The Enforcement Bureau will remove Global UC's certification from the Robocall Mitigation Database.¹⁰ Global UC failed to update its certification to include a robocall mitigation plan that describes the specific reasonable steps that it is taking to avoid the originating of illegal robocall traffic. Therefore, the Enforcement Bureau concluded that Global UC's certification is deficient and will remove it from the Robocall Mitigation Database, as described in greater detail in DA 22-1219.¹¹ **Upon removal, all intermediate providers and terminating voice service providers *must* cease accepting traffic from Global UC within two (2) business days.**¹² Downstream providers may not block 911 calls and must make reasonable efforts not to block calls from public safety answering points (PSAPs) and government emergency numbers.¹³ Global UC shall not refile until and 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.

The Enforcement Bureau will NOT remove the following certifications from the Robocall Mitigation Database at this time: Akabis, Cloud4; Horizon Technology Group; Morse

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

⁵ FCC, Robocall Mitigation Database, FCC, https://fccprod.servicenowservices.com/rmd?id=rmd_welcome (last visited Oct. 1, 2021).

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

⁷ *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, 1903, paras. 81 n.322, 83.

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

⁹ *Akabis, LLC*, Order, DA 22-1032, para. 1 (EB Oct. 3, 2022); *Cloud4 Inc.*, Order, DA 22-1038, para. 1 (EB Oct. 3, 2022); *Global UC Inc.*, Order, DA 22-1037, para. 1 (EB Oct. 3, 2022); *Horizon Technology Group LLC*, Order, DA 22-1036, para. 1 (EB Oct. 3, 2022); *Morse Communications Inc.*, Order, DA 22-1035, para. 1 (EB Oct. 3, 2022); *Sharon Telephone Company*, Order, DA 22-1034, para. 1 (EB Oct. 3, 2022); *Southwest Arkansas Telecommunications and Technology, Inc., LLC*, Order, DA 22-1033, para. 1 (EB Oct. 3, 2022).

¹⁰ *Global UC Inc.*, Removal Order, DA 22-1219 (EB Nov. 22, 2022).

¹¹ *Id.*

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

¹³ 47 CFR § 64.6305(e)(4).

Communications; Sharon Telephone Company; and SW Arkansas Telecommunications and Technology. Each company provided to the Enforcement Bureau and uploaded to the Robocall Mitigation Database a robocall mitigation program description. Each of these companies updated its certification by October 18.

We continue to assess the sufficiency of the robocall mitigation plans provided by these six companies. We reserve the right to take future enforcement action against any of the companies for deficiencies in their certifications—including, but not limited to, submission of robocall mitigation plans that do not include detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls.¹⁴ We encourage all voice service providers to keep their Robocall Mitigation Database certifications up-to-date and include detailed robocall mitigation plans as applicable.

Contact Information. For further information, please contact Kristi Thompson, Division Chief, Enforcement Bureau, Telecommunications Consumers Division, at 202-418-1318 or by email at Kristi.Thompson@fcc.gov; Lisa Zaina, Asst. Chief, Enforcement Bureau, Telecommunications Consumers Division at 202-418-2803 or by email at Lisa.Zaina@fcc.gov; or Daniel Stepanicich, Enforcement Bureau, Telecommunications Consumers Division, at 202-418-7451 or by email at Daniel.Stepanicich@fcc.gov.

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Chief

¹⁴ See *Second Caller ID Authentication Order*, 36 FCC Rcd at 1900, para. 78.