



PUBLIC NOTICE

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ROBOCALL ENFORCEMENT NOTICE TO ALL U.S.-BASED VOICE SERVICE PROVIDERS

FCC Enforcement Bureau Notifies All U.S.-Based Telecommunications Providers They May Block Auto Warranty Robocalls Originating From Certain Providers

File No. EB-TCD-21-00031913

By the Acting Chief, Enforcement Bureau:

The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) issues this Public Notice to notify all U.S.-based voice service providers about substantial amounts of apparently unlawful robocalls originating from a robocalling enterprise led by Roy Cox, Jr., Aaron Michael Jones, their individual associates, and associated entities (collectively, the Cox/Jones/Sumco Panama Operation).¹ **Pursuant to section 64.1200(k)(4) of the Commission's Rules, we hereby notify all U.S.-based voice service providers that they may block voice calls or cease to accept traffic from certain originating/intermediate providers listed in this Notice without liability under the Communications Act or the Commission's rules.**²

Combatting Apparently Unlawful Robocall Traffic Originating From Cox/Jones/Sumco Panama Operation. Contemporaneous with this Notice, the Bureau is issuing a cease-and-desist letter to each of the following voice service providers (the Originating Providers):³

- **Call Pipe**

¹ The Cox/Jones/Sumco Panama Operation includes the following individuals: Roy Melvin Cox Jr., resident of Tustin, California; Aaron Michael Jones, resident of Orange County, California; Scott Presta, resident of Lakeway, Texas; Kathleen Presta, resident of Lakeway, Texas; Stacey Yim, resident of La Crescenta, California; Jovita Migdaris Cedeno Luna, resident of San Francisco, Panama; Livia Szuromi, resident of Budapest, Hungary; Maria Alejandra Gonzalez; Davinder Singh; Andrea Baloghne Horvath, resident of Budapest, Hungary; Adam Radimiri; June Batista, resident of Costa Mesa, California; and Julie K. Bridge, resident of Upland, California. The Cox/Jones/Sumco Panama Operation also includes the following entities: Sumco Panama S.A.; Sumco Panama Inc.; Tech Direct LLC; Posting Express Inc.; 7 Sundays Inc.; and Texas Outdoor Adventures Inc. See investigation information on file in FCC File No. EB-21-00031913.

² 47 CFR § 64.1200(k)(4). We remind downstream voice service providers that taking advantage of this safe harbor and blocking calls from recipients of cease-and-desist letters that fail to take mitigation measures assists both Commission and industry efforts to reduce the impact of illegal robocalls on consumers.

³ Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Jon Luke, CEO, Call Pipe LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to James Ryan, Fugle Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Adam Radimiri, CEO, Geist Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Catherine

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- **Fugle Telecom**
- **Geist Telecom**
- **Global Lynks**
- **Mobi Telecom**
- **SipKonnnect**
- **South Dakota Telecom**
- **Virtual Telecom**

These voice service providers have been identified in tracebacks conducted by USTelecom’s Industry Traceback Group (Traceback Consortium)⁴ as the originators of, or intermediate providers for, apparently unlawful robocall traffic originating from the Cox/Jones/Sumco Panama Operation.

Pursuant to the cease-and-desist letters, each Originating Provider must immediately investigate and effectively mitigate the traffic identified in its respective letter, notify the Bureau and the Traceback Consortium within 48 hours of the steps taken to mitigate the identified traffic, and inform the Bureau and the Traceback Consortium within 14 days of the steps taken to prevent customers from using the service provider’s network to transmit illegal robocalls.⁵ If any of the Originating Providers fails to comply with the requirements set forth in the letters, it may be removed from the Robocall Mitigation Database, obligating all other providers to cease carrying any traffic from that Originating Provider.⁶

McCormick, CEO, Global Lynks LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Davinder Singh, President, Mobi Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Curt Ammon, South Dakota Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Dave Dimnick, CEO, SipKonnnect LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Maria Alejandra Gonzalez, Virtual Telecom Inc., and Andrea Horvath, CEO, Virtual Telecom Kft (July 7, 2022). These letters are available on the Commission's website at <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist>.

⁴ USTelecom’s Industry Traceback Group is the registered industry consortium selected pursuant to the TRACED Act, to conduct tracebacks to identify suspected bad actors. *Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, EB Docket No. 20-22, Report and Order, DA 21-1047 (EB 2021) (2021 Consortium Selection Order). See also TRACED Act § 13(d).

⁵ See, Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Jon Luke, CEO, Call Pipe LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to James Ryan, Fugle Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Adam Radimiri, CEO, Geist Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Catherine McCormick, CEO, Global Lynks LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Davinder Singh, President, Mobi Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Curt Ammon, South Dakota Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Dave Dimnick, CEO, SipKonnnect LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Maria Alejandra Gonzalez, Virtual Telecom Inc., and Andrea Horvath, CEO, Virtual Telecom Kft (July 7, 2022), <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist>; see also 47 CFR § 64.1200(k)(4). In the circumstances set forth in these cease-and-desist letters, we construe “effective mitigation measures” to mean taking all action necessary to cease carrying any such illegal traffic.

⁶ See 47 CFR § 64.6305(c) (stating that intermediate and terminating voice service providers may only accept calls from an originating voice service provider whose filing appears in the Robocall Mitigation Database); *Call*

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Purpose. Protecting individuals and entities from the dangers of unwanted and illegal robocalls is the Commission’s top consumer protection priority. As part of the Commission’s multiprong approach to combatting illegal robocalls, the Commission has taken steps to encourage voice service providers to block suspected illegal robocalls.⁷ Beginning in July 2020, the Commission permitted voice service providers to block traffic from other voice service providers that had been warned by the Commission that they were transmitting suspected illegal robocalls.⁸ The Bureau has issued several “cease-and-desist” letters, warning voice providers that they were transmitting suspected illegal robocalls and could be subject to blocking.⁹

Nature of Apparently Unlawful Robocall Traffic. The Cox/Jones/Sumco Panama Operation appears to be responsible for making more than eight billion unlawful robocalls to consumers in the United States since at least 2018. The Bureau has evidence that these calls appear to violate the Telephone Consumer Protection Act of 1991, the Truth In Caller ID Act of 2009, and/or the Pallone-Thune Telephone Robocall

Authentication Trust Anchor, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902-03, paras. 82-83 (2020) (allowing the Enforcement Bureau to remove deficient originating or terminating voice service provider certifications from the Robocall Mitigation Database). The recently adopted *Gateway Provider Order* extended the requirement for gateway providers to submit certifications 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. 35 & 40 (2022). This new requirement will be effective 60 days after publication of the *Gateway Provider Order* in the Federal Register. *Id.* at para. 248. The Further Notice of Proposed Rulemaking adopted with the *Gateway Provider Order* contemplates further extending the Robocall Mitigation Database requirements to all domestic providers. *Id.* at para. 188.

⁷ See 47 CFR § 64.1200(k); *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking, 35 FCC Rcd 7614, 7622, para. 19 (2020) (*July 2020 Call Blocking Order*) (establishing safe harbor for blocking traffic from bad-actor upstream voice service providers); *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, 34 FCC Rcd 4876, 4887-88, paras. 34-46 (2019) (*2019 Call Blocking Order*) (blocking based on reasonable analytics with consumer opt-out and consumer white lists); *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9706, 9709, para. 9 (2017) (*2017 Call Blocking Order*) (blocking of certain categories of calls highly likely to be illegal).

⁸ *July 2020 Call Blocking Order*, 35 FCC Rcd at 7628-29, para. 36-39; see 47 CFR § 64.1200(k)(4).

⁹ See, e.g., Letter from Rosemary Harold, Chief, FCC Enforcement Bureau, to Omar Luna, CEO, R Squared Telecom LLC (Apr. 13, 2021); Letter from Rosemary Harold, Chief, FCC Enforcement Bureau, to Vitaly Potapov, CEO, RSCOM LTD (Mar. 17, 2021). The Bureau uses data obtained from the Traceback Consortium. The Commission uses the term “bad actor” when discussing an originating or terminating provider that fails to take appropriate steps to prevent their network from being used to originate or transmit illegal calls. See *July 2020 Call Blocking Order*, 35 FCC Rcd at 7623, para. 19, n.57. More recent cease-and-desist letters have also warned the bad actor that continued origination of illegal robocalls following the letter will be used as evidence of a defective Robocall Mitigation Database certification, and the Bureau may initiate proceedings to remove the bad actor’s certification from the database. Letter from Rosemary Harold, Chief, FCC Enforcement Bureau, to Prince Anand, CEO, PZ/Illum Telecommunication LLC (Oct. 21, 2021); Letter from Rosemary Harold, Chief, FCC Enforcement Bureau, to Mohammed Mashadi, CEO, Primo Dialler LLC (Oct. 21, 2021); Letter from Rosemary Harold, Chief, FCC Enforcement Bureau, to Christopher Ismail, CEO, Duratel LLC (Oct. 21, 2021). See also 47 CFR § 64.6305(c).

Abuse Criminal Enforcement and Deterrence Act (TRACED Act) of 2019, collectively codified in section 227 of the Communications Act.¹⁰

The robocalls include prerecorded advertising messages marketing vehicle service warranties. The messages encouraged call recipients to follow prompts to speak with a “warranty specialist” about extending or reinstating their car warranty. For example, some of the robocalls contained the following message:

We’ve been trying to reach you concerning your car’s extended warranty. You should have received something in the mail about your car’s extended warranty. Since we have not gotten a response, we are giving you a final courtesy call before we close out your file. Press 2 to be removed and put on our Do-Not-Call list. Press 1 to speak with someone about extending or reinstating your car’s warranty. Again, press 1 to speak with a warranty specialist. (Pause) Or call our 800 number at 833-304-1447.¹¹

In contravention of an agreement by Cox not to engage in telemarketing activities, recent tracebacks show that the Cox/Jones/Sumco Panama Operation is still generating millions of apparently unlawful calls to consumers on a daily basis.¹²

Follow-Up Order. In the event that any of the Originating Providers fail to comply with the requirements laid out in the relevant cease-and-desist letter, the Bureau will issue a follow-up *Order* to all U.S.-based voice service providers notifying them of this fact. **In the event that a follow-up *Order* is issued by the Bureau in this matter, pursuant to section 64.1200(n)(2) of the Commission’s Rules, all U.S.-based voice service providers shall be required to “[t]ake steps to effectively mitigate illegal traffic,” including investigating and taking steps—up to and including blocking, if necessary—to prevent the source of the illegal traffic from continuing to originate such traffic.**¹³

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,

¹⁰ 47 U.S.C. § 227. See Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Jon Luke, CEO, Call Pipe LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to James Ryan, Fugle Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Adam Radimiri, CEO, Geist Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Catherine McCormick, CEO, Global Lynks LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Davinder Singh, President, Mobi Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Curt Ammon, South Dakota Telecom LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Dave Dimnick, CEO, SipKconnect LLC (July 7, 2022); Letter from Loyaan A. Egal, Acting Chief, FCC Enforcement Bureau, to Maria Alejandra Gonzalez, Virtual Telecom Inc., and Andrea Horvath, CEO, Virtual Telecom Kft (July 7, 2022). These letters are available on the Commission’s website at <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist>.

¹¹ See Recording on file at FCC File No. EB-21-00031913.

¹² See traceback data on file in FCC File No. File No. EB-21-00031913; *United States v. Roy M. Cox, Jr. et al*, No. 8:11-cv-01910-DOC-JPR (C.D. Cal. 2013).

¹³ 47 CFR § 64.1200(n)(2); see also 47 CFR § 64.1200(f)(18); *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Fourth Report and Order, 35 FCC Red 15221, 15231, paras. 26-27 (2020).

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ENFORCEMENT BUREAU
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