

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Viettel Business Solutions Company	)	EB-TCD-23-00034918
Etihad Etisalat (Mobily)	)	EB-TCD-23-00034920
Claude ICT Poland Sp. z o. o. dba TeleCube.PL	)	EB-TCD-23-00034944
Nervill LTD	)	EB-TCD-23-00034946
Textodog Inc. dba Textodog and Textodog Software Inc.	)	EB-TCD-23-00035605
Phone GS	)	EB-TCD-23-00035606
Computer Integrated Solutions dba CIS IT & Engineering	)	EB-TCD-23-00035613
Datacom Specialists	)	EB-TCD-23-00035614
DomainerSuite, Inc.	)	EB-TCD-23-00035615
Evernex SMC PVT LTD	)	EB-TCD-23-00035616
Humbolt Voip	)	EB-TCD-23-00035617
My Taxi Ride Inc	)	EB-TCD-23-00035618

**REMOVAL ORDER**

**Adopted: February 22, 2024**

**Released: February 22, 2024**

By the Chief, Enforcement Bureau:

**I. INTRODUCTION**

1. By this Order, the Federal Communications Commission's (FCC or Commission) Enforcement Bureau (Bureau) removes the certifications of Viettel Business Solutions Company, Etihad Etisalat (Mobily), Claude ICT Poland Sp. z o. o. dba TeleCube.PL, Nervill LTD, Textodog Inc. dba Textodog and Textodog Software Inc., Phone GS, Computer Integrated Solutions dba CIS IT & Engineering, Datacom Specialists, DomainerSuite, Inc., Evernex SMC PVT LTD, Humbolt Voip, and My Taxi Ride Inc (collectively, the Companies) from the Robocall Mitigation Database (Database). All of the Companies failed to correct their facially deficient Database certifications (Certifications) or otherwise demonstrate why the Bureau should not remove their Certifications from the Database following the Bureau's October 16, 2023 Orders directing them to take either one of these actions.<sup>1</sup> Four of the Companies are domestic voice service providers:<sup>2</sup> Computer Integrated Solutions dba CIS IT &

<sup>1</sup> See *Viettel Business Solutions Company*, Order, DA 23-979, 2023 WL 7124558 (EB Oct. 16, 2023); *Etihad Etisalat (Mobily)*, Order, DA 23-967, 2023 WL 7124525 (EB Oct. 16, 2023); *Claude ICT Poland Sp. z o. o. dba TeleCube.PL*, Order, DA 23-961, 2023 WL 7124512 (EB Oct. 16, 2023); *Nervill LTD*, Order, DA 23-970, 2023 WL 7124532 (EB Oct. 16, 2023); *Textodog Inc. dba Textodog and Textodog Software Inc.*, Order, DA 23-976, 2023 WL 7124549 (EB Oct. 16, 2023); *Phone GS*, Order, DA 23-972, 2023 WL 7124537 (EB Oct. 16, 2023); *Computer Integrated Solutions dba CIS IT & Engineering*, Order, DA 23-962, 2023 WL 7124515 (EB Oct. 16, 2023); *Datacom Specialists*, Order, DA 23-963, 2023 WL 7124517 (EB Oct. 16, 2023); *DomainerSuite, Inc.*, Order, DA 23-964, 2023 WL 7124519 (EB Oct. 16, 2023); *Evernex SMC PVT LTD*, Order, DA 23-966, 2023 WL 7124521 (EB Oct. 16, 2023); *Humbolt Voip*, Order, DA 23-965, 2023 WL 7124520 (EB Oct. 16, 2023); *My Taxi Ride Inc*, Order, DA 23-968, 2023 WL 7124526 (EB Oct. 16, 2023) (collectively, *Show Cause Orders*).

<sup>2</sup> See 47 CFR § 64.6300(o) (defining "voice service").

Engineering, Datacom Specialists, DomainerSuite, Inc., and Humbolt Voip. **Removal from the Database requires all intermediate providers and voice service providers to cease accepting all calls directly from those four providers.**<sup>3</sup> The remaining eight providers named in this Removal Order are foreign voice service providers:<sup>4</sup> Viettel Business Solutions Company (Vietnam),<sup>5</sup> Etihad Etisalat (Mobily) (Saudi Arabia), Claude ICT Poland Sp. z o. o. dba TeleCube.PL (Poland), Nervill LTD (Israel), Textodog Inc. dba Textodog and Textodog Software Inc. (Canada), Phone GS (France), Evernex SMC PVT LTD (Pakistan), and My Taxi Ride Inc.<sup>6</sup> **Removal from the Database requires all intermediate providers and voice service providers to cease accepting all calls directly from those eight providers that use U.S. North American Numbering Plan (NANP) resources in the caller ID field to send voice traffic to residential or business subscribers in the United States.**<sup>7</sup> We note that downstream providers may not block emergency calls to 911 and must take reasonable efforts not to block calls from public safety answering points (PSAPs) and government emergency numbers.<sup>8</sup> Furthermore, none of the Companies shall re-file Certifications without the prior approval of both the FCC's Wireline Competition Bureau and the Bureau.<sup>9</sup>

## II. BACKGROUND

### A. Database Requirements for Voice Service Providers

2. Protecting Americans from the dangers of unwanted and illegal robocalls is the Commission's top consumer protection priority.<sup>10</sup> As part of its multipronged approach to combatting

<sup>3</sup> See *id.* § 64.6305(g)(1).

<sup>4</sup> See *id.* § 64.6300(c) (defining "foreign voice service provider").

<sup>5</sup> Viettel Business Solutions Company shares an address with Viettel Business Solutions Corporation, a "member" of Viettel Group. See Viettel Solutions, Viettel Solutions is now official A2P messaging provider for Meta in Vietnam (Jul. 18, 2023), <https://solutions.viettel.vn/en/en/press-release/viettel-solutions-is-now-official-a2p-messaging-provider-for-meta-in-vietnam.html> (identifying Viettel Business Solutions Corporation as a member and identifying address); Viettel Business Solutions Company (No. RMD0004919) Fed. Comm'n's Comm'n, Robocall Mitigation Database (filed July 16, 2021) (showing same address for Viettel Business Solutions Company). On May 31, 2023, the U.S. Department of State announced that it entered into an administrative settlement with VTA Telecom Corporation (formerly Viettel America Corporation), a subsidiary of Viettel Group, to resolve violations of the Arms Export Control Act and the International Traffic in Arms Regulation. See Press Release, U.S. Dept. of State, U.S. Department of State Concludes Settlement Resolving Export Violations by VTA Telecom Corporation (May 31, 2023), <https://www.state.gov/u-s-department-of-state-concludes-settlement-resolving-export-violations-by-vta-telecom-corporation/>; U.S. Dept. Justice, *Exhibit A to McDermott Will & Emery LLP Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended* (Sep. 7, 2017), <https://efile.fara.gov/docs/6447-Exhibit-AB-20170907-2.pdf> (stating VTA Telecom Corp. is a subsidiary of Viettel Group). VTA Telecom Corporation also filed an International Section 214 Application but withdrew its application in 2020. Letter from David Keir, Counsel, VTA Telecom Corp., to Marlene Dortch, Secretary, Fed. Comm'n's Comm'n (Jun. 23, 2020) (on file in ITC-214-20130718-00195). Any entity that seeks to provide United States-international common carrier service must obtain prior Commission approval pursuant to Section 214 of the Communications Act of 1934 by filing an International Section 214 Application with the Commission. International Section 214 Application Filing Guidelines, Fed. Comm'n's Comm'n, *Introduction to International Section 214 Application Filing Requirements* (May 14, 2015), <https://www.fcc.gov/research-reports/guides/international-section-214-application-filing-guidelines>.

<sup>6</sup> My Taxi Ride claimed it was a foreign voice service provider in its RMD certification but did not indicate its nation of origin.

<sup>7</sup> See 47 CFR § 64.6305(g)(2).

<sup>8</sup> See *id.* § 64.6305(g)(5).

<sup>9</sup> See *Global UC Inc*, Removal Order, 37 FCC Rcd 13376, 13376, para. 1 (EB 2022) (*Global UC Removal Order*).

<sup>10</sup> See Consumer Guide, Fed. Comm'n's Comm'n, *Stop Unwanted Robocalls and Texts* (July 7, 2023), <https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and->

(continued....)

illegal robocalls, the Commission has mandated adoption of the Secure Telephony Identity Revisited/Signature-based Handling of Asserted information using toKENs (STIR/SHAKEN) caller ID authentication framework.<sup>11</sup> All voice service providers are required to file Certifications with the Commission declaring whether their traffic is authenticated with STIR/SHAKEN or subject to a robocall mitigation program.<sup>12</sup> Voice service providers that have not fully implemented STIR/SHAKEN must detail in a robocall mitigation plan attached to their Certifications the specific reasonable steps they have taken to avoid originating illegal robocall traffic.<sup>13</sup> Provider Certifications and robocall mitigation plans are publicly available in the Database.<sup>14</sup>

3. Although Commission rules do not require foreign voice service providers to file a Certification in the Database, foreign voice service providers that use U.S. telephone numbers to send voice traffic to U.S. subscribers must follow the same certification requirements as domestic voice service providers in order to be listed in the Database.<sup>15</sup> The Commission has emphasized that these rules do not constitute the exercise of jurisdiction over foreign voice service providers.<sup>16</sup>

4. Commission rules prohibit any intermediate provider or terminating voice service provider from accepting voice traffic directly from any voice service provider or gateway provider that does not appear in the Database, including any foreign voice service provider using U.S. NANP resources in the caller ID field.<sup>17</sup> The Bureau may take enforcement action, including removal of a Certification from the Database, against voice service providers or gateway providers, including foreign voice service providers that have deficient Certifications.<sup>18</sup> A deficient Certification includes one that fails to describe specific reasonable steps a voice service provider or gateway provider has taken to avoid originating or carrying illegal robocall traffic as required by section 64.6305(d)-(e) of the Commission's rules.<sup>19</sup> Prior to removing a Certification from the Database, the Bureau must provide notice to the voice service

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[texts#:~:text=Unwanted%20calls%20%E2%80%93%20including%20illegal%20and,our%20top%20consumer%20protection%20priority.](#)

<sup>11</sup> See 47 CFR § 64.6301(a); *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241 (2020).

<sup>12</sup> 47 CFR § 64.6305(d); *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902, para. 82 (2020) (*Second Caller ID Authentication Order*).

<sup>13</sup> 47 CFR § 64.6305(d)(2)(ii); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902, para. 82.

<sup>14</sup> Fed. Comm'n's Comm'n, *Robocall Mitigation Database*, [https://fccprod.servicenowservices.com/rmd?id=rmd\\_welcome](https://fccprod.servicenowservices.com/rmd?id=rmd_welcome) (last visited Jan. 10, 2024).

<sup>15</sup> *Second Caller ID Authentication Order*, *supra* note 12, at 1905-1906, paras. 90, 93.

<sup>16</sup> *Id.* at 1910, para. 99 & n.370 (finding that these rules have only an indirect effect on foreign 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, 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, 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, 37 FCC Rcd 6865, 6913-14, para. 120 & n.354 (2022) (*Gateway Provider Order*) (finding that amendments to these provisions only have an indirect effect on foreign voice service providers).

<sup>17</sup> 47 CFR § 64.6305(g); *Gateway Provider Order*, 37 FCC Rcd at 6883-84, para. 44.

<sup>18</sup> See 47 CFR § 0.111(a)(28); *Second Caller ID Authentication Order*, *supra* note 12, at 1901-03, 1906, para. 81 & nn.83, 93, 322; *Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40.

<sup>19</sup> 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii); see also *Second Caller ID Authentication Order*, *supra* note 12, at 1900-02, paras. 77-82; *Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40.

provider and allow an opportunity to cure.<sup>20</sup> If the voice service provider fails to cure, the Bureau will issue an order to show cause why the provider should not be removed and provide a further opportunity for the provider to cure.<sup>21</sup> If the provider still does not cure or provide a sufficient explanation why its filing is not deficient, the Bureau may remove the provider's Certification from the Database.<sup>22</sup>

## B. The Companies' Deficient Certifications

5. All of the Companies filed Certifications in the Database and indicated that they are voice service providers.<sup>23</sup> All of the Companies certified that they had not implemented or only partially implemented STIR/SHAKEN and all or some of the calls originating on their networks were subject to a robocall mitigation program.<sup>24</sup> Commission rules require all voice service providers to file robocall mitigation plans with their Certifications outlining the specific reasonable steps they are taking to avoid originating robocalls.<sup>25</sup> None of the Companies filed a robocall mitigation plan in the Database. Instead, they submitted documents that have no relevance to a robocall mitigation plan.<sup>26</sup> The Wireline Competition Bureau contacted the Companies by email on either January 28, 2022, or February 18, 2022, and notified the Companies that their attachments did not satisfy the requirements under the Commission's rules.<sup>27</sup> The Wireline Competition Bureau did not receive responses from any of the Companies, and none of the Companies corrected their deficient Certifications.

6. On October 16, 2023, the Bureau ordered the Companies to correct the deficiencies in their Certifications or explain why their Certifications should not be removed from the Database.<sup>28</sup> The Companies had 14 days to file responses with the Bureau either informing the Bureau that the deficiency had been corrected or explaining why their Certifications should not be removed from the Database.<sup>29</sup> The Bureau did not receive any responses from the Companies, and none of the Companies made any amendments to their Certifications.

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<sup>20</sup> *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, 2023 WL 2582652, at \*21, para. 60 (Mar. 17, 2023) (*Sixth Caller ID Authentication Order*).

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> *See Show Cause Orders*, *supra* note 1. Viettel Business Solutions Company, Etihad Etisalat (Mobily), Claude ICT Poland Sp. z o. o. dba TeleCube.PL, Nervill LTD, Textodog Inc. dba Textodog and Textodog Software Inc., Phone GS, Evernex SMC PVT LTD, and My Taxi Ride Inc indicated they are foreign voice service providers.

<sup>24</sup> *See id.* at \*4, para. 7.

<sup>25</sup> 47 CFR § 64.6305(d)(2)(ii).

<sup>26</sup> *See Show Cause Orders*, *supra* note 1, at \*4, para. 7 (describing the attachment filed by each company). We note that all of the Certifications were not merely deficient, but were facially deficient because they did not attach any robocall mitigation plan. *See Sixth Caller ID Authentication Order*, *supra* note 20, at \*21, para. 61 ("A certification is 'facially deficient' where the provider fails to submit a robocall mitigation plan within the meaning of our rules. That is, it fails to submit any information regarding the 'specific reasonable steps' it is taking to mitigate illegal robocalls."). The Commission has adopted an expedited procedure for removing facially deficient certifications, *see id.* at \*21-22, paras. 61-62, but we did not use that expedited procedure here because the Bureau already had initiated removal under our default removal procedure before the expedited procedure was adopted. The Bureau plans to use the expedited removal procedure where appropriate in the future.

<sup>27</sup> *See Show Cause Orders*, *supra* note 1, at \*4, para. 7.

<sup>28</sup> *Id.* at \*5, para. 12.

<sup>29</sup> *See id.* at \*5, para. 11.

### III. DISCUSSION

7. We find that the Companies' Certifications are deficient because the attachment submitted with each Certification fails to include a description of any robocall mitigation efforts being taken by the Companies.<sup>30</sup> The Wireline Competition Bureau notified the Companies of these deficiencies, which they did not cure.<sup>31</sup> The Bureau then ordered the Companies to cure the deficiencies in their Certifications or explain why their Certifications should not be removed from the Database, and the Companies did neither.<sup>32</sup> Therefore, the Certifications now warrant removal.

8. Accordingly, we remove the Companies' Certifications from the Database.<sup>33</sup> Once removed, **all intermediate providers and voice service providers must cease accepting all calls directly from: (i) Computer Integrated Solutions dba CIS IT & Engineering; (ii) Datacom Specialists; (iii) DomainerSuite, Inc.; and (iv) Humbolt Voip and cease accepting all calls directly from (v) Viettel Business Solutions Company; (vi) Etihad Etisalat (Mobily); (vii) Claude ICT Poland Sp. z o. o. dba TeleCube.PL; (viii) Nervill LTD; (ix) Textodog Inc. dba Textodog and Textodog Software Inc.; (x) Phone GS, Inc.; (xi) Evernex SMC PVT LTD; and (xii) My Taxi Ride Inc that use U.S. NANP numbers in the caller ID field to send voice traffic to residential or business subscribers in the United States.**<sup>34</sup> Downstream providers may not block emergency calls to 911 and must take reasonable efforts not to block calls from PSAPs and government emergency numbers.<sup>35</sup> The Companies shall not refile in the Database unless and until both the Wireline Competition Bureau and the Bureau determine that the Companies have addressed and resolved any deficiencies or shortcomings in their Certifications.<sup>36</sup>

9. *Additional Information.* For further information about this *Order*, contact Alexander Hobbs, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, at [alexander.hobbs@fcc.gov](mailto:alexander.hobbs@fcc.gov) or (202) 418-7433.

### IV. ORDERING CLAUSES

10. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227, 251(e), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227, 251(e), 403; and sections 0.111, 0.311, 1.1, and 64.6305 of the Commission's rules, 47 CFR §§ 0.111, 0.311, 1.1, 64.6305, this Removal Order is **ADOPTED**.

11. **IT IS FURTHER ORDERED** that Viettel Business Solutions Company, Etihad Etisalat (Mobily), Claude ICT Poland Sp. Z o. o. dba TeleCube.PL, Nervill LTD, Textodog Inc. dba Textodog and Textodog Software Inc., Phone GS, Computer Integrated Solutions dba CIS IT & Engineering, Datacom Specialists, DomainerSuite, Inc., Evernex SMC PVT LTD, Humbolt Voip, and My Taxi Ride Inc are **IMMEDIATELY REMOVED** from the Database.

12. **IT IS FURTHER ORDERED** that Viettel Business Solutions Company, Etihad Etisalat (Mobily), Claude ICT Poland Sp. z o. o. dba TeleCube.PL, Nervill LTD, Textodog Inc. dba Textodog and Textodog Software Inc, Phone GS, Computer Integrated Solutions dba CIS IT & Engineering, Datacom Specialists, DomainerSuite, Inc., Evernex SMC PVT LTD, Humbolt Voip, and My Taxi Ride Inc shall not refile in the Robocall Mitigation Database unless and until both the Wireline Competition Bureau and

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<sup>30</sup> See *Sixth Caller ID Authentication Order*, *supra* note 20, at \*21, para. 61.

<sup>31</sup> See *Show Cause Orders*, *supra* note 1, at \*4, para. 7.

<sup>32</sup> *Id.* at \*5, para. 12.

<sup>33</sup> See *Second Caller ID Authentication Order*, *supra* note 12, at 1901-02, para. 83.

<sup>34</sup> 47 CFR § 64.6305(g)(1)-(2); *Second Caller ID Authentication Order*, *supra* note 12, at 1904, para. 86.

<sup>35</sup> 47 CFR § 64.6305(g)(5).

<sup>36</sup> See *Global UC Removal Order*, *supra* note 9, at 13376, para. 1.

the Enforcement Bureau determine that each entity has addressed and resolved any deficiencies or shortcomings in its Certification.

13. **IT IS FURTHER ORDERED** that copies of this Order shall be sent by email and registered mail, return receipt requested, to: Viettel Business Solutions Company, quynhnt58@viettel.com.vn, No 1 Tran Huu Duc Street, Ha Noi City Viet Nam, Ha Noi, Vietnam; Etihad Etisalat (Mobily), ITM@mobily.com.sa, C4 King Fahd Road, Riyadh 11423, Saudi Arabia; Claude ICT Poland Sp. z o. o. dba TeleCube.PL, ic@telecube.pl, ul. Toszecka, 101, 44-100 Gliwice, Poland; Nervill LTD, ophir@lcom.co.il, Avraham Giron 9, Yahoood, Israel; Textodog Inc. dba Textodog and Textodog Software Inc., alain@textodog.com, 1200 de Maisonneuve Ouest, Suite 5E, Montreal H3A 0A1, Canada; Phone GS, abuse@phone.gs, 41 Avenue du 8 Mai 1945, 95200 Sarcelles, France; Computer Integrated Solutions dba CIS IT & Engineering, baradie@cismichigan.com, 24472 Northwestern Hwy, Southfield, MI 48075; Datacom Specialists, lcummings@datacomspecialists.com, 6811 Harrison Ave, Suite B, Cincinnati, OH 45247; DomainerSuite, Inc., tony@domainersuite.com, 6061 Woodham Road, Denman Island, BC V0R 1T0, Canada; Evernex SMC PVT LTD, sales@ever-nex.com, Plot No. 395-396, I-9/3 Industrial Area Near 7up Chowk, Islamabad Capital Territory 44000, Pakistan; Humbolt Voip, Jose@humboltvoip.com, Wilson Park Dr., Oakville, Canada; and My Taxi Ride Inc, miguel@mytaxiride.com, 516 West 175th Street, Apt. 42, New York, NY 10033.

14. **IT IS FURTHER ORDERED** that pursuant to section 1.102(b) of the Commission's rules, 47 CFR § 1.102(b), this Removal Order **SHALL BE EFFECTIVE** upon release.

FEDERAL COMMUNICATIONS COMMISSION

Loyaan A. Egal  
Chief  
Enforcement Bureau