

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

In the Matter of

Ananya traders llc

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EB-TCD-25-00038541

ORDER

Adopted: September 9, 2025**Released: September 9, 2025**

By the Acting Chief, Enforcement Bureau:

I. INTRODUCTION

1. By this Order, the Enforcement Bureau (Bureau) of the Federal Communications Commission (Commission or FCC) directs Ananya traders llc (Ananya or Company) to cure the deficiencies in the Company's Robocall Mitigation Database (RMD) certification and notify the Bureau that the deficiencies have been cured; or to file a response explaining why the Bureau should not remove the Company's certification from the RMD.¹ The Company's RMD certification is deficient because (a) the certification lacks newly-required information; and (b) a robocall mitigation plan with required information was not provided.² **Removal of a Company's certification from the RMD would require all intermediate providers and voice service providers³ to cease accepting all calls directly from the Company.**⁴ The Company must provide its response to this Order to the Bureau no later than 14 days after the Order is released.⁵

II. BACKGROUND

2. The FCC established the RMD in 2020 to promote transparency and effective robocall mitigation.⁶ On March 16, 2023, the Commission adopted amendments to section 64.6305 of its rules in the *Sixth Caller ID Authentication Order* that enhanced the information requirements for RMD certifications and expanded the obligations to submit a robocall mitigation plan for new and existing

¹ See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, 2604, para. 60 (2023) (*Sixth Caller ID Authentication Order*).

² See 47 CFR § 64.6305(d)-(e). While the Company filed a certification in the RMD on July 6, 2022, it never uploaded the robocall mitigation plan required by our rules. See Ananya traders llc (No. RMD0008583), FCC, Robocall Mitigation Database (filed July 6, 2022), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=f7e059301b8f7c1093d3a820f54bcd5&view=sp (Ananya RMD Certification).

³ For purposes of this order, we use the term "voice service provider" consistent with the definition of "voice service" in section 64.6300 of our rules. See 47 CFR § 64.6300(o). As such, the term "voice service provider" excludes intermediate providers (i.e., gateway providers and non-gateway intermediate providers), as those terms are defined in section 64.6300. See *id.* § 64.6300(d), (g), (i).

⁴ See 47 CFR § 64.6305(g).

⁵ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60; 47 CFR §§ 1.4(b)(2), 1.102(b)(1).

⁶ *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*).

filers.⁷ On May 18, 2023, the Commission adopted additional amendments to section 64.6305 in the *Seventh Call Blocking Order* that required all providers to include a commitment to respond fully to traceback requests within 24 hours in their RMD certifications.⁸ Both of these rule amendments took effect on February 26, 2024, and all filers were required to update their RMD certifications to provide the newly required information, including robocall mitigation plans with required information, by that same date.⁹

3. Under the amended rule, voice service providers, gateway providers, and non-gateway intermediate providers¹⁰ must submit several pieces of information in their RMD certifications. *First*, a provider must certify that all calls that it originates on its network are subject to a robocall mitigation program, that any prior certification has not been removed by Commission action and that it has not been prohibited from filing in the RMD, and whether it has fully, partially, or not implemented STIR/SHAKEN on the Internet Protocol portions of its network.¹¹ *Second*, the provider must upload a robocall mitigation plan that describes the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program based on the role(s) it serves in the call chain,¹² including: (a) a description of the effective measures it is taking to prevent new and renewing customers from originating illegal robocalls (if it is a voice service provider); (b) a description of any call analytic system(s) that it utilizes, including those operated by a third-party vendor; and (c) a description of the procedures it is using to know its upstream providers.¹³ *Third*, the provider must provide its business name, address, and other identifying information, including contact information for a person responsible for addressing robocall mitigation-related issues, and its principals, affiliates, subsidiaries, and parent companies.¹⁴ *Fourth*, the provider must include certain other information, including: (a) the role it is playing in the call chain; (b) detailed information supporting any claimed STIR/SHAKEN implementation extension or exemption; (c) a statement whether it or any affiliated entity has been subject to a Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD certification; and (d) the provider's commitment to respond fully to

⁷ *Sixth Caller ID Authentication Order*, *supra* note 1, at 2592-2601, paras. 36-52.

⁸ *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404, 5422, para. 52 (2023) (*Seventh Call Blocking Order*).

⁹ See *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, WC Docket No. 17-97, Public Notice, 39 FCC Rcd 383, 383-87 (WCB 2024) (*RMD Public Notice*); Fed. Commc'ns Comm'n, *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, 89 Fed. Reg. 4833, 4833 (Jan. 25, 2024) (establishing February 26, 2024 as the effective date for the amendments to section 64.6305).

¹⁰ The *Sixth Caller ID Authentication Order* amended section 64.6305 to require non-gateway intermediate providers to file certifications in the RMD for the first time. See 47 CFR § 64.6305(f); *Sixth Caller ID Authentication Order*, *supra* note 1, at 2593, para. 38; *RMD Public Notice*, 39 FCC Rcd at 384.

¹¹ 47 CFR §§ 64.6305(d)(1), (e)(1), (f)(1); *Sixth Caller ID Authentication Order*, *supra* note 1, at 2595, para. 42; *id.* at 2597, para. 46; *RMD Public Notice*, 39 FCC Rcd at 385.

¹² See *Sixth Caller ID Authentication Order*, *supra* note 1, at 2593, para. 39; *RMD Public Notice*, 39 FCC Rcd at 385, 388.

¹³ 47 CFR §§ 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii); *Sixth Caller ID Authentication Order*, *supra* note 1, at 2593-95, paras. 40-41; *RMD Public Notice*, 39 FCC Rcd at 386-87.

¹⁴ 47 CFR §§ 64.6305(d)(4), (e)(4), (f)(4); *Sixth Caller ID Authentication Order*, *supra* note 1, at 2595-96, 2597, 2599, paras. 42-43, 46, 48; *RMD Public Notice*, 39 FCC Rcd at 385-86.

traceback requests within 24 hours.¹⁵

4. The Bureau may remove a certification from the RMD that is deficient.¹⁶ To do so, the Commission first contacts the provider, notifying it that its certification is deficient, explaining the nature of the deficiency, and giving the provider an opportunity to cure the deficiency.¹⁷ If the provider fails to cure the deficiency, the Bureau will release an order finding that a provider's certification is deficient based on the available evidence and direct the provider to, within 14 days, cure the deficiency in its certification and notify the Bureau that the deficiency has been cured, or explain why the Bureau should not remove the Company's certification from the RMD.¹⁸ If the provider fails to cure the deficiency or provide a sufficient explanation why its certification is not deficient within that 14-day period, the Bureau will release an order removing the provider's certification from the RMD.¹⁹

5. The Wireline Competition Bureau (WCB) conducted a review of certifications in the RMD and identified providers that failed to update their RMD certifications (including robocall mitigation plans) with the newly required information by the February 26, 2024 deadline to comply with section 64.6305, as amended.

6. Ananya filed its certification in the RMD on July 6, 2022.²⁰ On September 6, 2024, WCB notified Ananya that its certification was noncompliant with section 64.6305 because the Company had failed to submit an updated RMD certification, including a robocall mitigation plan with the required information, by the February 26, 2024 deadline.²¹ Additionally, WCB informed the Company that it "must submit an updated certification and updated robocall mitigation plan in the Robocall Mitigation Database by Monday, October 7, 2024."²² After this second deadline, the Company still had not updated their RMD certification or uploaded a robocall mitigation plan with the required information; as a result, WCB referred the Company to the Bureau to initiate removal proceedings.

7. Ananya is a domestic voice service provider with a registered address in Sheridan, WY.²³ Between June 13, 2024, and May 14, 2025, Ananya has appeared in 298 tracebacks as an originating, gateway, or non-responsive provider for suspected illegal calls.²⁴ For months, Ananya apparently

¹⁵ 47 CFR §§ 64.6305(d)(2)(i), (iii), (iv), 64.6305(e)(2)(i), (iii), (iv), 64.6305(f)(2)(i), (iii), (iv); *Sixth Caller ID Authentication Order*, *supra* note 1, at 2596-99, paras. 43-47; *RMD Public Notice*, *supra* note 9, at 385-86.

¹⁶ 47 CFR § 0.111(a)(28)(i); *see Second Caller ID Authentication Order*, *supra* note 6, at 1902-1903, para. 83 (voice service provider certifications); *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, 37 FCC Rcd 6865, 6882, para. 40 (2022) (*Gateway Provider Order*) (gateway provider certifications); *Sixth Caller ID Authentication Order*, *supra* note 1, at 2602-2603, paras. 56-57 (non-gateway intermediate provider certifications).

¹⁷ *Sixth Caller ID Authentication Order*, *supra* note 1, at 2604, para. 60.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *See* Ananya RMD Certification.

²¹ Email from Robocall Mitigation Database Team (Sept. 6, 2024) (on file at EB-TCD-25-00038541) (Notice)

²² *Id.*

²³ *See* Ananya RMD Certification.

²⁴ *See* ITG Subpoena Response (July 2, 2025) (on file at EB-TCD-25-00038541). For example, traceback request 26965, dated May 14, 2025, shows that Ananya Traders transmitted a call that apparently impersonated a store regarding an order or purchase that was made.

transmitted hundreds of fraudulent calls that impersonated financial institutions and companies like Amazon.²⁵ Brand impersonation calls have persisted for years and are harmful to consumers and company brand reputations.²⁶ The RMD “serves an essential role” in protecting consumers against illegal robocalls and its effectiveness “requires that providers exercise the highest level of diligence in making and maintaining accurate submissions.”²⁷

III. DISCUSSION

A. The Company’s Certification Is Deficient Because It Lacks Required Information

8. The Commission’s rules required all voice service providers, gateway providers, and non-gateway intermediate providers to provide compliant RMD certifications by February 26, 2024.²⁸ WCB notified the Company that its RMD certification was noncompliant with section 64.6305 because it had failed to update its certification, including a robocall mitigation plan, with required information by February 26, 2024, and that it had until October 7, 2024 to update its certification.²⁹ Following WCB’s notification, the Company did not update its RMD certification despite having an additional opportunity to update its certification.³⁰ Thus, Ananya’s certification is deficient because it lacks required information, including a compliant robocall mitigation plan.³¹

B. The Company Must Cure or Face Removal from the RMD and Widespread Call Blocking

9. The Bureau may remove deficient certifications from the RMD after providing sufficient notice and opportunity to cure.³² We direct the Company to cure its deficient RMD certification and notify the Bureau that the deficiencies have been cured or explain why the Bureau should not remove the

²⁵ See *Id.*

²⁶ Letter from Joshua M. Bercu, Executive Director, Industry Traceback Group to Marlene Dortch, Secretary, Federal Commc’ns Comm’n (Nov. 13, 2023) (“ITG tracebacks principally trace examples of high-volume pure fraud robocall campaigns and unsolicited lead generation telemarketing robocall campaigns. These campaigns include brand impersonation . . .”); PR Newswire, *YouMail Protective Services Survey Reveals Scale of Brand Imposter Risks to Consumers* (Apr. 25, 2023), <https://www.prnewswire.com/news-releases/youmail-protective-services-survey-reveals-scale-of-brand-imposter-risks-to-consumers-301806355.html> (revealing that YouMail data shows that that brand impersonation scams are ubiquitous, affect young people, are costly, and severely harm brands).

²⁷ *Improving the Effectiveness of the Robocall Mitigation Database Amendment of Part 1 of the Commission’s Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, Report and Order, WC Docket No. 24-213, MD Docket No. 10-234, Report and Order, 2025 WL 99665, at *1 (Jan. 8, 2025).

²⁸ 47 CFR § 64.6305(d)-(f); see *Sixth Caller ID Authentication Order*, *supra* note 1, at 2599, para. 49; *RMD Public Notice*, *supra* note 9, at 383-84.

²⁹ Notice, *supra* note **Error! Bookmark not defined.**

³⁰ *Id.*

³¹ See *Sixth Caller ID Authentication Order*, *supra* note 1, at 2592-99, paras. 36-49.

³² 47 CFR § 0.111(a)(28)(i); see *Second Caller ID Authentication Order*, *supra* note 6, at 1902-03, para. 83; *Gateway Provider Order*, *supra* note 16, at 6882, para. 40; *Sixth Caller ID Authentication Order*, *supra* note 1, at 2602-2603, paras. 56-57; see also *Viettel Business Solutions Co. et al.*, Order, 39 FCC Rcd 1319, 1319, para. 1 (2024) (removing certifications of 12 entities from the Robocall Mitigation Database after being provided with notice and opportunity to cure, and an opportunity to show cause as to why the provider should not be removed); *BPO Innovate*, Order, 39 FCC Rcd 130, 130, para. 1 (2024) (directing BPO Innovate to show cause within 14 days as to why the provider should not be removed from the Robocall Mitigation Database after being provided with notice and opportunity to cure).

Company's certification from the RMD.³³ This Order affords the Company a final opportunity to cure its deficiencies by updating its certification, including a robocall mitigation plan with required information.³⁴

10. The Company shall file its response with the Bureau within fourteen (14) calendar days of the release of this Order.³⁵ Failure to respond and correct the deficiencies or provide a sufficient explanation for why the Company's certification should remain in the RMD will result in removal of the Company's certification.³⁶ **Removal of a Company's certification from the RMD will require all voice service providers and intermediate providers to cease accepting calls directly from that Company.**³⁷ If the Company's certification is removed from the RMD, it shall not be permitted to refile until both the Bureau and WCB determine that the Company has addressed and resolved the deficiencies in its RMD certification.³⁸

IV. ORDERING CLAUSES

11. 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), and 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, and 64.6305, this Order is **ADOPTED**.

12. **IT IS FURTHER ORDERED** that Ananya traders llc **SHALL FILE** a written response to this Order **within fourteen (14) calendar days** from the release of this Order. The written response must either inform the Bureau that the Company has corrected the deficiencies in its RMD certification or explain why its certification should not be removed from the RMD.

13. The response must be mailed to the Office of the Secretary, Federal Communications Commission, 45 L Street NE, Washington, DC 20554, ATTN: Enforcement Bureau – Telecommunications Consumers Division. The response must also be e-mailed to EnforcementBureauTCD@fcc.gov.

14. **IT IS FURTHER ORDERED** that copies of this Order shall be sent by e-mail and registered mail, return receipt requested, to: Pawan Kumar, the robocall mitigation contact (as certified in the RMD) for Ananya traders llc, 30 N Gould St Ste R, Sheridan, WY 82801 and pawan.kumar@ananya-traders.com.

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

³³ See *Sixth Caller ID Authentication Order*, *supra* note 1, at 2604, para. 60.

³⁴ *Id.*

³⁵ *Id.*

³⁶ See *id.*

³⁷ 47 CFR § 64.6305(g)(1), (3).

³⁸ See *Sixth Caller ID Authentication Order*, *supra* note 1, at 2597, para. 46 & n.173.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre
Acting Chief
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