

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

In the Matter of

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chase tech llc

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EB-TCD-24-00037629

ORDER

Adopted: September 15, 2025**Released: September 15, 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) removes the certification of chase tech llc (chase tech or Company) from the Robocall Mitigation Database (RMD). The Company's RMD certification was found to contain false information regarding the Company as it submitted personal identification information (PII) of an individual who is unaffiliated with the Company, thus making the certification deficient under the Commission's rules. The Bureau notified the Company of this deficiency on April 14, 2025, and provided the Company an opportunity to cure the deficiency or explain why the Bureau should not remove the Company's certification from the RMD.¹ The Company failed to do either. **Removal of a Company's certification from the RMD requires all intermediate providers and voice service providers to cease accepting all calls directly from the Company.**² Furthermore, the Company shall not re-file an RMD certification without the prior approval of the FCC's Wireline Competition Bureau (WCB) and the Bureau.

II. BACKGROUND

2. The FCC established the RMD in 2020 to promote transparency and effective robocall mitigation.³ 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.⁴ This rule amendment took effect on February 26, 2024, and required all existing filers to update their RMD certifications to provide the newly-required information and newly-required or updated robocall mitigation plans by that same date.⁵

¹ See E-mail from Genesis Monserrate, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau, to chase tech llc (Apr. 14, 2025, 9:22 AM EDT) (*RMD Notice*).

² See 47 CFR § 64.6305(g).

³ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902, paras. 82-83 (2020) (*Second Caller ID Authentication Order*).

⁴ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, 2588-99, paras. 28-48 (2023) (*Sixth Caller ID Authentication Order*).

⁵ 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*); *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, (continued....)

3. Under the amended rule, voice service providers, gateway providers, and non-gateway intermediate providers⁶ must submit several pieces of information in their RMD certifications, such as the provider's 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.⁷ The Commission's rules require an officer of the provider filing a certification in the RMD to declare, under penalty of perjury, that the information included in the certification is true and correct.⁸ The submission of false or inaccurate information makes a certification deficient and may result in an enforcement action against the filer.⁹

4. The Bureau may remove a certification from the RMD that is deficient.¹⁰ Moreover, where a violation of section 64.6305 of the Commission's rules is willful, the deficient certification may be removed from the RMD under a two-step expedited procedure.¹¹ *First*, the Bureau issues a notice to the provider informing it that its certification is deficient and represents a willful violation, explains the nature of the deficiency and the willful violation, and allows 10 days for the provider to cure the deficiency or explain why its certification is not deficient.¹² *Second*, if the provider fails to cure or establish that there is no deficiency within the 10-day period, the Bureau releases an order removing the provider's certification from the Robocall Mitigation Database.¹³

89 Fed. Reg. 4833, 4833 (Jan. 25, 2024) (establishing February 26, 2024 as the effective date for the amendments to section 64.6305).

⁶ 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*, 38 FCC Rcd at 2593, para. 38; *RMD Public Notice*, 39 FCC Rcd at 384.

⁷ 47 CFR § 64.6305(d)(4), (e)(4), (f)(4); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2595-96, 2597, 2599, paras. 42-43, 46, 48; *RMD Public Notice*, 39 FCC Rcd at 385-86.

⁸ 47 CFR § 64.6305(d)(3)(ii), (e)(3)(ii), (f)(3)(ii) (each citing 47 CFR § 1.16).

⁹ Aside from removing a deficient certification from the RMD, the Commission may impose a forfeiture on filers that submit false or inaccurate information in the RMD. See *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*, WC Docket No. 24-213, MD Docket No., 10-234, Report and Order, FCC 24-135, at 8-9, para. 18 (Jan. 8, 2025) (adopting a \$10,000 base forfeiture for submitting false or inaccurate information to the RMD).

¹⁰ 47 CFR § 0.111(a)(28)(i); see *Second Caller ID Authentication Order*, *supra* note 3, at 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) (addressing gateway provider certifications); *Sixth Caller ID Authentication Order*, *supra* note 4, at 2602-03, paras. 56-57 (addressing non-gateway intermediate provider certifications).

¹¹ See *Sixth Caller ID Authentication Order*, *supra* note 4, at 2604-05, para. 62 (setting out the two-step expedited procedure and explaining that it applies to situations where a provider "has 'willfully' violated its Robocall Mitigation Database filing obligation within the meaning of that term in section 9(b) of the Administrative Procedure Act (APA), 5 U.S.C. § 558(c), which applies to revocation of licenses"); *Coosemans Specialties, Inc. v. Dep't of Agric.*, 482 F.3d 560, 567 (D.C. Cir. 2007) ("[A]n action [under 5 U.S.C. § 558(c)] is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements.") (quoting *Finer Foods Sales Co. v. Block*, 708 F.2d 774, 778 (D.C. Cir. 1983)).

¹² See *Sixth Caller ID Authentication Order*, *supra* note 4, at 2605, para. 62.

¹³ See *id.*

5. Chase tech submitted its RMD certification on November 11, 2024.¹⁴ The Bureau's investigation determined that the Company's RMD certification was deficient because it contained false certification data. Specifically, the Company used the PII of an individual who is unaffiliated with the Company in the following fields: business address, robocall mitigation contact name, contact business address, and contact telephone number.¹⁵ WCB has removed the unauthorized PII from the Company's certification,¹⁶ but the certification continues to be deficient because the Company has not submitted any accurate information in those four required fields in response to the *RMD Notice*.¹⁷

6. On April 14, 2025, the Bureau sent a *RMD Notice* requiring chase tech, within 10 days of the date of the Notice, to cure its deficiency and notify the Bureau of the same, or inform the Bureau why it should not be removed from the RMD.¹⁸ Accordingly, the deadline to comply with the *RMD Notice* was April 24, 2025. The Company failed to cure the deficiency within the 10-day cure period, and it still has not cured the deficiency as of the date of this Order.

III. DISCUSSION

A. The Company's RMD Certification Is Deficient and Will Be Removed

7. The Commission finds that the Company has a deficient RMD certification because it failed to submit truthful and accurate information in its certification. The Company submitted false certification contained PII belonging to an individual unaffiliated with the Company in the following fields: business address, robocall mitigation contact name, contact business address, and contact telephone number.¹⁹ We also find that the Company's submission of the PII of an individual who is unaffiliated with the Company in the Company's RMD certification constitutes a willful violation of section 64.6305. As noted above, the relevant PII of this individual was extensive and included the person's name, address, and phone number. Erroneously entering this kind of personal information into multiple fields in the RMD, and then certifying upon penalty of perjury that this information is accurate, can only be viewed as willful behavior because, at the very least, it evinces a careless disregard of the obligation to populate the RMD with accurate information, as required by our rules. Furthermore, despite a notification from the Bureau that the Company's certification was deficient and represented a willful violation, and a final opportunity to cure the deficiency or explain why the Company should not be removed,²⁰ the Company failed to respond or cure the deficiency. Therefore, the Company's RMD certification warrants removal.

8. We remove the Company's certifications from the RMD as of the release date of this Order. Once removed, **all intermediate providers and voice service providers *must* cease accepting**

¹⁴ chase tech llc, Certification (No. RMD0024046), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Nov. 11, 2024), (Chase tech RMD Certification).

¹⁵ See RMD Notice, *supra* note 1, at 1.

¹⁶ See 5 U.S.C. § 552a(e)(6) (agencies shall make reasonable efforts to ensure that records are accurate, complete, timely, and relevant).

¹⁷ See RMD Notice, *supra* note 1, at 1. Our rules require the submission of the information in these four fields. See 47 CFR § 64.6305(d)(4)(i), (v), (e)(4)(i), (v), (f)(4)(i), (v).

¹⁸ See RMD Notice, *supra* note 1, at 2.

¹⁹ Chase tech RMD Certification.

²⁰ See RMD Notice, *supra* note 1, at 2.

traffic from the Company within two business days of the release date of this Order.²¹ The Company shall not refile in the RMD unless and until both WCB and the Bureau consent.²²

IV. ORDERING CLAUSES

9. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227, 227b, 251(e), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227, 227b, 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 Removal Order is **ADOPTED**.

10. **IT IS FURTHER ORDERED** that within **two business days** of the release of this order all intermediate providers and voice service providers **MUST CEASE ACCEPTING TRAFFIC FROM THE COMPANIES**.

11. **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.

12. **IT IS FURTHER ORDERED** that chase tech llc is **IMMEDIATELY REMOVED** from the Robocall Mitigation Database as of the release date of this Order.

13. **IT IS FURTHER ORDERED** that chase tech llc shall not refile in the Robocall Mitigation Database unless and until both the Wireline Competition Bureau and the Enforcement Bureau consent.

14. **IT IS FURTHER ORDERED** that a copy of this Order shall be sent by email to jmarketing120@gmail.com.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre
Acting Chief
Enforcement Bureau

²¹ 47 CFR § 64.6305(g); *Sixth Caller ID Authentication Order*, *supra* note 4, at 2603, para. 58 (affirming “the existing Enforcement Bureau process, where providers are given two business days to block calls following Commission notice of removal from the database”); *Global UC Inc*, Removal Order, 37 FCC Rcd 13376, 13379, para. 8 (EB 2022) (*Global UC Order*) (requiring intermediate providers and terminating voice service providers to begin blocking within two business days of the order) .

²² See *Global UC Order*, 37 FCC Rcd at 13379, para. 8.