

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

In the Matter of

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Ananya traders llc

EB-TCD-25-00039315¹

ORDER

Adopted: September 30, 2025**Released: September 30, 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 Ananya traders llc (Ananya or Company) from the Robocall Mitigation Database (RMD). The Company's RMD certification is deficient because (a) it does not include a robocall mitigation plan; and (b) the certification lacks information required by the Commission's rules. On September 9, 2025, the Bureau issued an Order affording the Company a final opportunity to cure the deficiencies in its RMD certification and notify the Bureau that the deficiencies have been cured; or to file a response with sufficient explanation for why the Bureau should not remove the Company's certification from the RMD.² 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.**³ Furthermore, the Company shall not re-file an RMD certification without the prior approval of the Bureau and the Wireline Competition Bureau (WCB).

II. BACKGROUND

2. The FCC established the RMD in 2020 to promote transparency and effective robocall mitigation.⁴ 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.⁵ 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

¹ The investigation began under EB-TCD-25-00038541 and was subsequently assigned File No. EB-TCD-25-00039315. Any future correspondence with the Commission concerning this matter should reflect the new case number.

² See *Ananya traders llc*, Order, DA 25-830, 2025 WL 2612113 at *3, para. 9 (EB Sept. 9, 2025) (*Ananya Show Cause Order*).

³ See 47 CFR § 64.6305(g).

⁴ *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*).

⁵ *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*).

traceback requests within 24 hours in their RMD certifications.⁶ Both of these rule amendments 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.⁷

3. Under the amended rule, voice service providers, gateway providers, and non-gateway intermediate providers⁸ 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.⁹ *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,¹⁰ including: (a) a description of the affirmative, 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.¹¹ *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.¹² *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 traceback requests within 24 hours.¹³

⁶ *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*).

⁷ *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*, 89 Fed. Reg. 4833, 4833 (Jan. 25, 2024) (establishing February 26, 2024 as the effective date for the amendments to section 64.6305) (*Seventh Call Blocking Order Effective Date*).

⁸ 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.

⁹ 47 CFR §§ 64.6305(d)(1), (e)(1), (f)(1); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2595, 2597, paras. 42, 46; *RMD Public Notice*, 39 FCC Rcd at 385.

¹⁰ *See Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2593, para. 39; *RMD Public Notice*, 39 FCC Rcd at 385, 388.

¹¹ 47 CFR §§ 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2593-95, paras. 40-41; *RMD Public Notice*, 39 FCC Rcd at 386-87.

¹² 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.

¹³ 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*, 38 FCC Rcd at 2596-99, paras. 43-47; *RMD Public Notice*, 39 FCC Rcd at 385-86.

4. The Bureau may remove a certification from the RMD that is deficient.¹⁴ 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.¹⁵ 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 cure the deficiency in its certification within 14 days, 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.¹⁶ 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.¹⁷

5. Following the February 26, 2024 effective date of the amended RMD requirements,¹⁸ WCB contacted Ananya on September 6, 2024 and notified the Company that its certification was deficient because it had failed to submit an updated certification and robocall mitigation plan by the February 26, 2024 deadline.¹⁹ 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."²⁰ After this second deadline, the Company still had not updated its RMD certification or uploaded a robocall mitigation plan with the required information; as a result, WCB referred the Company to the Bureau for further action.

6. On September 9, 2025, the Bureau sent an *Order* requiring Ananya, within 14 days of the date of the *Order*, to cure its deficiencies and notify the Bureau of the same, or inform the Bureau why it should not be removed from the RMD.²¹ Therefore, the deadline to comply with the *Order* was September 23, 2025. The Company failed to cure the deficiencies within the 14-day cure period, and it still has not cured the deficiencies as of the date of this Order.

III. DISCUSSION

7. The Bureau finds that the Company has a deficient RMD certification because it failed to upload a robocall mitigation plan and update its RMD certification to include information required by February 26, 2024. Despite a notification from the Commission informing the Company that its RMD certification was noncompliant, and an order from the Bureau to cure the deficiencies or explain why the Company should not be removed,²² the Company failed to respond or cure the deficiencies. Therefore, the Company's RMD filing is deficient and warrants removal.

¹⁴ 47 CFR § 0.111(a)(28)(i); see *Second Caller ID Authentication Order*, 36 FCC Rcd 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*, 38 FCC Rcd at 2602-03, paras. 56-57 (addressing non-gateway intermediate provider certifications).

¹⁵ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ See *Seventh Call Blocking Order Effective Date*, 89 Fed. Reg. at 4833 (establishing February 26, 2024, as the effective date for the amendments to section 64.6305).

¹⁹ Email from Robocall Mitigation Database Team (Sept. 6, 2024) (on file at EB-TCD-25-00038541) (Notice).

²⁰ *Id.*

²¹ *Ananya Show Cause Order*, 2025 WL 2612113 at *3, para. 9.

²² *Id.*

8. We remove the Company's certification from the RMD as of the release date of this Order. Once removed, **all intermediate providers and voice service providers must cease accepting calls directly from the Company within two business days of the release date of this Order.**²³ The Company shall not refile in the RMD unless and until both the Bureau and WCB consent.²⁴

IV. ORDERING CLAUSES

9. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227(e), 227b, and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227, 227b, 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 CALLS DIRECTLY FROM THE COMPANIES**.

11. **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.

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

13. **IT IS FURTHER ORDERED** that Ananya traders llc shall not refile in the Robocall Mitigation Database unless and until both the Enforcement Bureau and the Wireline Competition Bureau consent.²⁵

14. **IT IS FURTHER ORDERED** that a copy 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.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre
Acting Chief
Enforcement Bureau

²³ 47 CFR § 64.6305(g); *Sixth Caller ID Authentication Order*, 38 FCC Rcd 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). We remind downstream providers that they may not block a voice call under any circumstances if the call is an emergency call placed to 911, and must make all reasonable efforts to ensure that they do not block any calls from public safety answering points and government emergency numbers. 47 CFR § 64.6305(g)(5).

²⁴ See *Global UC Order*, 37 FCC Rcd at 13379, para. 8.

²⁵ Reinstatement requests can be sent to RMDReinstatementrequest@fcc.gov.