

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

In the Matter of	)	
	)	
	)	
BPO VOIP	)	EB-TCD-25-00039435 <sup>1</sup>
End Zone Financial Services	)	
ESMIYAH LLC	)	
Fiber Flux VOIP	)	
Intuitive Communications LLC	)	
IP Networks LLC	)	
Nova Dialer LLC	)	
Schedule 10 Specialists, Inc.	)	
Servisden	)	
SkyPulse Voip	)	
The Vision Connect	)	
VoipTech LLC	)	

**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 certifications of the companies (each, a Company; collectively, the Companies) identified in Appendix A. The Companies' RMD filings are deficient because each of the Companies failed to respond to one or more traceback requests from the industry traceback consortium, which is contrary to their certifications in the RMD.<sup>2</sup> On September 9, 2025, the Bureau issued an Order affording each Company a final opportunity to cure the deficiency in its RMD certification and notify the Bureau that the deficiency has been cured; or to file a response with sufficient explanation why the Company's certification is not deficient.<sup>3</sup> The Companies 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.**<sup>4</sup> Furthermore, the

<sup>1</sup> The investigation began under EB-TCD-25-00038541 and was subsequently assigned File No. EB-TCD-25-00039435. Any future correspondence with the Commission concerning this matter should reflect the new case number.

<sup>2</sup> See 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(iii) (requiring voice service providers, gateway providers, and non-gateway intermediate providers, respectively, to certify that they commit to responding within 24 hours to all traceback requests).

<sup>3</sup> See *BPO VOIP et al.*, Order, DA 25-829, 2025 WL 2612111 at \*3, para. 9 (EB Sept. 9, 2025) (*BPO VOIP et al. Show Cause Order*).

<sup>4</sup> See 47 CFR § 64.6305(g).

Companies 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.<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup> 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.<sup>8</sup>

3. Under the amended rule, voice service providers, gateway providers, and non-gateway intermediate providers<sup>9</sup> must submit several pieces of information in their RMD certifications. As relevant here, section 64.6305 requires voice service providers, gateway providers, and non-gateway intermediate providers to certify, under penalty of perjury, that all calls that they originate, carry, or process are subject to a robocall mitigation program, and such programs must include “a commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.”<sup>10</sup> Section 64.6305 also requires voice service providers, gateway providers, and non-gateway intermediate providers to include in their certifications a statement of the provider’s “commitment to respond within 24 hours to all traceback requests from the Commission, law

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<sup>5</sup> *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*).

<sup>6</sup> *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*).

<sup>7</sup> *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*).

<sup>8</sup> 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*).

<sup>9</sup> 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.

<sup>10</sup> 47 CFR § 64.6305(a)(2), (d)(1) (voice service providers); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2592-93 paras. 37-38; *RMD Public Notice*, 39 FCC Rcd at 384-85. The Industry Traceback Group (ITG) established by USTelecom – The Broadband Association currently serves as the registered industry traceback consortium. See Implementing Section 13(d) of the Pallone-Thune Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act), EB Docket No. 20-22, Report and Order, 38 FCC Rcd 7561, 7561-62, para. 1 (EB 2023).

enforcement, and the industry traceback group.”<sup>11</sup> Each of the Companies made this certification in the RMD.<sup>12</sup> However, each of the Companies has not responded to at least one traceback request.<sup>13</sup>

4. The Bureau may remove a certification from the RMD that is deficient.<sup>14</sup> 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.<sup>15</sup> If the provider fails to

<sup>11</sup> 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(iii).

<sup>12</sup> See BPO VOIP Listing (No. RMD0011778), FCC, Robocall Mitigation Database (filed Aug. 28, 2023), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=1f06456b1ba89150503110ad9c4bcb2&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=1f06456b1ba89150503110ad9c4bcb2&view=sp) (Robocall Mitigation Database Filing); End Zone Financial Services Listing (No. RMD0019680), FCC, Robocall Mitigation Database (filed Mar. 29, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=a01f9c381bd1c610867665b5624bcb6b&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=a01f9c381bd1c610867665b5624bcb6b&view=sp) (Robocall Mitigation Database Filing); ESMIYAH LLC Listing (No. RMD0018684), FCC, Robocall Mitigation Database (filed Feb. 26, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=5b3ffbd8a7a08a10ab3765b70cbb3599&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=5b3ffbd8a7a08a10ab3765b70cbb3599&view=sp) (Robocall Mitigation Database Filing); Fiber Flux VOIP Listing (No. RMD0020181), FCC, Robocall Mitigation Database (filed Apr. 3, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=b9faa90a1b1dca10867665b5624bcb29&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=b9faa90a1b1dca10867665b5624bcb29&view=sp) (Robocall Mitigation Database Filing); Intuitive Communications LLC Listing (No. RMD0022572), FCC, Robocall Mitigation Database (filed Oct. 5, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=9127acdc979012101a6df06ad053af89&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=9127acdc979012101a6df06ad053af89&view=sp) (Robocall Mitigation Database Filing); IP Networks LLC Listing (No. RMD0022528), FCC, Robocall Mitigation Database (filed Nov. 1, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=f3d0b1ba870c9210dc93b848cebb35a0&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=f3d0b1ba870c9210dc93b848cebb35a0&view=sp) (Robocall Mitigation Database Filing); Nova Dialer LLC Listing (No. RMD0026348), FCC, Robocall Mitigation Database (filed Jan. 17, 2025), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=934c0d9f974f12d08031b22de053af74&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=934c0d9f974f12d08031b22de053af74&view=sp) (Robocall Mitigation Database Filing); Schedule 10 Specialists, Inc. Listing (No. RMD0026569), FCC, Robocall Mitigation Database (filed Feb. 4, 2025), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=21f81ec193af9e50ae2efdd86cba1030&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=21f81ec193af9e50ae2efdd86cba1030&view=sp) (Robocall Mitigation Database Filing); Servisden Listing (No. RMD0021811), FCC, Robocall Mitigation Database, (filed June 7, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=d49e25d71b2286504b29a682604bcbca&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=d49e25d71b2286504b29a682604bcbca&view=sp) (Robocall Mitigation Database Filing); SkyPulse Voip Listing (No. RMD0020180), FCC, Robocall Mitigation Database (filed Apr. 3, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=4a4ae9861b1dca10867665b5624bcb18&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=4a4ae9861b1dca10867665b5624bcb18&view=sp) (Robocall Mitigation Database Filing); The Vision Connect Listing (No. RMD0020732), FCC, Robocall Mitigation Database (filed Apr. 17, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=b630327687e14610b986a7570cbb35cb&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=b630327687e14610b986a7570cbb35cb&view=sp) (Robocall Mitigation Database Filing); VoipTech LLC Listing (No. RMD0015008), FCC, Robocall Mitigation Database (filed Apr. 23, 2024), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=f4e349021ba4795093d3a820f54bcb32&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=f4e349021ba4795093d3a820f54bcb32&view=sp) (Robocall Mitigation Database Filing).

<sup>13</sup> See *BPO VOIP et al. Show Cause Order*, 2025 WL 2612111, Appendix B.

<sup>14</sup> 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).

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

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.<sup>16</sup> 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.<sup>17</sup>

5. On April 14, 2025, the Bureau issued a Notification of Deficient Robocall Mitigation Database Certification to the Companies (Notification).<sup>18</sup> The Notification informed the companies that their certifications were deficient because "each Company has not responded to at least one traceback request from the ITG" and instructed them to "cure the deficiency by responding to each traceback request issued by the ITG."<sup>19</sup>

6. On September 9, 2025, the Bureau sent an *Order* requiring the Companies identified in Appendix A, within 14 days of the date of the *Order*, to cure its deficiency and notify the Bureau of the same, or inform the Bureau why its certification is not deficient.<sup>20</sup> The deadline to comply with the *Order* was September 23, 2025. The Companies failed to cure their deficiencies within the 14-day cure period, and none of the Companies submitted any explanation why its certification is not deficient. Furthermore, none of the Companies has cured its deficiency as of the date of this Order.

### III. DISCUSSION

7. The Bureau finds that the Companies listed in Appendix A have deficient RMD certifications because they failed to respond to the applicable traceback request(s) identified in the *Order*. Despite a notification from the Commission informing each Company that its RMD certification was noncompliant, and an order from the Bureau to cure the deficiency or explain why the Company should not be removed,<sup>21</sup> each of the Companies listed in Appendix A failed to respond or cure the deficiency. Therefore, each of the Companies' RMD filing is deficient and warrants removal.

8. We remove the certifications of the Companies identified in Appendix A 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 Companies within two business days of the release date of this Order.**<sup>22</sup> The Companies shall not refile in the RMD unless and until both the Bureau and WCB consent.<sup>23</sup>

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<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> See Email from Genesis Monserrate, Attorney Advisor, FCC Enforcement Bureau to Companies' Robocall Mitigation Database Contacts (Apr. 14, 2025, 10:26 EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification (Notification)).

<sup>19</sup> *Id.* at 1, 2.

<sup>20</sup> *BPO VOIP et al. Show Cause Order*, 2025 WL 2612111 at \*3, para. 9.

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

<sup>22</sup> 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).

<sup>23</sup> See *Global UC Order*, 37 FCC Rcd at 13379, para. 8.

#### IV. ORDERING CLAUSES

9. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227(e), 227b, 251(e), 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 LISTED IN APPENDIX A**.

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 the Companies identified in Appendix A are **IMMEDIATELY REMOVED** from the Robocall Mitigation Database as of the release date of this Order.

13. **IT IS FURTHER ORDERED** that the Companies identified in Appendix A shall not refile in the Robocall Mitigation Database unless and until both the Enforcement Bureau and the Wireline Competition Bureau consent.<sup>24</sup>

14. **IT IS FURTHER ORDERED** that a copy of this Order shall be sent by e-mail and registered mail, return receipt requested, to the robocall mitigation contact (as certified in the RMD) for each Company listed in Appendix A.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre  
Acting Chief  
Enforcement Bureau

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<sup>24</sup> Reinstatement requests can be sent to [RMDReinstatementrequest@fcc.gov](mailto:RMDReinstatementrequest@fcc.gov).

## APPENDIX A

RMD File No.	Business Name
RMD0011778	BPO VOIP
RMD0019680	End Zone Financial Services
RMD0018684	ESMIYAH LLC
RMD0020181	Fiber Flux VOIP
RMD0022572	INTUITIVE COMMUNICATIONS LLC
RMD0022528	IP NETWORKS LLC
RMD0026348	Nova Dialer LLC
RMD0026569	SCHEDULE 10 SPECIALISTS, INC.
RMD0021811	SERVISDEN
RMD0020180	SkyPulse VOIP
RMD0020732	The Vision Connect
RMD0015008	VoipTech LLC