

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

In the Matter of)	
)	
SK Teleco LLC)	EB-TCD-24-00036937
)	EB Docket No. 22-174
)	

INITIAL DETERMINATION ORDER AND ORDER TO SHOW CAUSE

Adopted: April 20, 2026

Released: April 20, 2026

By the Chief, Enforcement Bureau:

I. INTRODUCTION

By this Initial Determination Order, the Enforcement Bureau (Bureau) issues its initial determination that SK Teleco LLC (SK Teleco or Company) has not complied with section 64.1200(n)(1) of the Federal Communications Commission’s (Commission or FCC) rules, which require all voice service providers to respond to a traceback request within 24 hours of receipt of that request.¹ This Initial Determination Order follows the Bureau’s December 2, 2025 Notification of Suspected Illegal Traffic and Robocall Mitigation Database Filing Deficiencies (SK Teleco Notice or Notice), which identified suspected illegal traffic that the Company was originating and instructed SK Teleco to investigate the traffic, block the traffic unless it determined that it had not originated the traffic or the traffic was not illegal, and provide a report to the Bureau within 14 days.² The Notice also required SK Teleco to respond fully to 16 traceback requests from USTelecom’s Industry Traceback Group (ITG).³ SK Teleco responded to the Notice on December 3, 2025, and December 10, 2025, but the Company did not provide a sufficient response to the Notice.⁴ As a result, SK Teleco is not in compliance with section 64.1200(n) of the Commission’s rules.⁵

Pursuant to section 64.1200(n)(2)(ii) of the Commission’s rules, SK Teleco now has 14 days to respond to this Initial Determination Order with a final response to the Bureau’s apparent finding and to

¹ See *id.* § 64.1200(n)(1). For purposes of this section, the term “voice service provider” refers to that term as used in section 64.1200 of the Commission’s rules, which is based on the definition of “voice service” in 47 CFR § 64.1600(r) and includes intermediate providers.

² See Letter from Patrick Webre, Chief, FCC Enforcement Bureau, to Saurabh Rajput, Chief Executive Officer, SK Teleco LLC, 2025 WL 4083224 (Dec. 2, 2025), <https://docs.fcc.gov/public/attachments/DOC-415638A1.pdf> (SK Teleco Notice).

³ *Id.* at 7. The ITG is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks. See *Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, EB Docket No. 20-22, Report and Order, DA 23-719, 2023 WL 5358422, at *1, para. 1 (EB Aug. 18, 2023); see also *Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act*, Pub. L. No. 116-105, § 13(d), 133 Stat. 3274, 3287-88 (2019).

⁴ See generally Letter from Saurabh Rajput, Chief Executive Officer, SK Teleco LLC, to FCC Enforcement Bureau (Dec. 3, 2025) (on file in EB-TCD-24-00036937) (SK Teleco 48-hour Response); Letter from Saurabh Rajput, Chief Executive Officer, SK Teleco LLC, to FCC Enforcement Bureau (Dec. 10, 2025) (on file in EB-TCD-24-00036937) (SK Teleco Final Response).

⁵ See 47 CFR § 64.1200(n)(1)-(2).

demonstrate compliance with the Commission's rules.⁶ If SK Teleco fails to provide an adequate response within 14 days or continues to originate or allow onto the U.S. network substantially similar illegal traffic, the Bureau will issue a Final Determination Order.⁷ Any provider immediately downstream from SK Teleco will then be required to block and cease accepting all traffic received directly from SK Teleco beginning 30 calendar days after release of the Final Determination Order.⁸

II. BACKGROUND

A. Legal Framework for Mandatory Blocking Rules

1. Protecting consumers in the United States from the dangers and risks of illegal robocalls is the Commission's top consumer protection priority.⁹ To further that mission, *all* voice service providers must meet several obligations, including responding to traceback requests within 24 hours and blocking illegal traffic.¹⁰ Traceback request responses are essential to identifying callers placing illegal calls and voice service providers facilitating the calls.¹¹ When the Commission provides notice to a voice service provider suspected of transmitting illegal traffic, the provider must commit to do two things—first, to block the identified traffic in the absence of evidence the traffic is legal, and second, to certify that they will continue to block the identified traffic submitted to the Bureau.¹² Voice service providers are also required to certify in the Robocall Mitigation Database (RMD) that they commit to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the ITG, and to cooperate with the same in investigating and stopping any illegal robocallers that use their services to originate, carry, or process calls.¹³ In these ways, the Commission places critical obligations on originating and gateway providers to police their networks and imposes consequences on such providers that fail to do so.¹⁴

2. Once a provider receives a notification of suspected illegal traffic from the Bureau pursuant to section 64.1200(n)(2)(i)(A), the provider must comply with the notice by investigating and

⁶ *See id.* § 64.1200(n)(2)(ii).

⁷ *See id.* § 64.1200(n)(2)(iii).

⁸ *Id.* § 64.1200(n)(3).

⁹ *Improving Customer Service and Protecting Consumers through Onshoring, Advanced Methods to Target and Eliminate Unlawful Robocalls; Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket Nos. 26-52, 17-59 and 02-278, Notice of Proposed Rulemaking in CG Docket No. 26-52, Tenth Further Notice of Proposed Rulemaking in CG Docket No. 17-59, Further Notice of Proposed Rulemaking in CG Docket No. 02-278 (2026).

¹⁰ *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, 5405 (2023) (*Originating Provider Blocking Order*).

¹¹ *Id.* at 5412.

¹² 47 CFR § 64.1200(n)(2)(i). 47 CFR § 64.1200(n)(2)(i).

¹³ *Id.* § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(iii).

¹⁴ *See* 47 CFR § 64.1200(n)(2) (setting forth investigation and blocking obligations for originating and gateway providers); *id.* § 64.1200(n)(3) (requiring downstream providers, when notified by the Bureau, to block all traffic from an upstream provider that has failed to comply with section 64.1200(n)(2)); *see also* *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, FCC 22-37, 37 FCC Rcd 6865, 6897-901, paras. 74-85 (*Gateway Provider Order*); *Originating Provider Blocking Order*, 38 FCC Rcd at 5415-20, paras. 29-48.

reporting the results of its investigation to the Bureau.¹⁵ If the provider's investigation determines it served as the originating or gateway provider for the identified traffic, the provider must: (i) within the timeframe specified in the notice, block or cease accepting the identified traffic and substantially similar traffic on an ongoing basis; (ii) certify in its report to the Bureau that it is blocking the identified traffic and will continue to do so; and (iii) in its report to the Bureau, describe its plan to identify and block substantially similar traffic on an ongoing basis.¹⁶ If the provider determines that the identified traffic is not illegal, it shall provide an explanation as to why the provider reasonably concluded that the identified traffic is not illegal and what steps it took to reach that conclusion.¹⁷ If the provider concludes that it did not serve as the originating or gateway provider for the traffic, then it must provide an explanation as to how it reached that conclusion and, if applicable, identify the upstream provider(s) from which it received the identified traffic, as well as take lawful steps, if possible, to mitigate such traffic.¹⁸

3. If the notified provider fails to respond to a notice, fails to respond sufficiently, continues to originate or transmit substantially similar traffic, or if the Bureau determines the identified traffic is illegal despite the notified provider's assertions to the contrary, the Bureau will issue an Initial Determination Order stating its initial determination that the provider is not in compliance with section 64.1200(n)(2) of the Commission's rules and providing the notified provider with at least 14 days to provide a final response.¹⁹ If the Bureau determines that the notified provider's response to the Initial Determination Order is inadequate (including instances where the notified provider fails to respond),²⁰ or if it continues to originate or transmit substantially similar traffic, the Bureau will issue a Final Determination Order finding that the provider is not in compliance with section 64.1200(n)(2) of the Commission's rules and directing all immediate downstream providers to block and cease accepting all traffic that they receive from the notified provider starting 30 calendar days after the release date of the Final Determination Order.²¹ To provide notification to all downstream providers, the Bureau publishes each Final Determination Order in EB Docket No. 22-174.²² Prior to complying with the mandatory blocking requirement, immediate downstream providers may initiate permissive blocking of all traffic from the identified provider pursuant to section 64.1200(k)(4) of the Commission's rules.²³

B. SK Teleco's Origination of Suspected Illegal Robocalls

4. The Bureau identified 13 calls placed between January 21, 2025, and February 3, 2025, that featured prerecorded messages and were placed without the requisite consent of the called party, in apparent violation of section 227(b)(1)(A) of the Communications Act of 1934, as amended, and the Commission's rules.²⁴ These calls purported to be from either "Mary" or "Kimberly," both "from

¹⁵ See 47 CFR § 64.1200(n)(2)(i)(A).

¹⁶ See *id.*

¹⁷ See *id.* § 64.1200(n)(2)(i)(B).

¹⁸ See *id.*

¹⁹ *Id.* § 64.1200(n)(2)(ii).

²⁰ See *Belthrough LLC*, Final Determination Order, DA 26-237 (EB Mar. 12, 2026) (finding that Belthrough's failure to respond to the Bureau's Initial Determination Order was an inadequate response); *One Eye LLC*, Final Determination Order, 38 FCC Rcd 4211, 4214, para. 8 (EB 2023) (finding that One Eye's failure to respond to the Bureau's Initial Determination Order was an inadequate response).

²¹ 47 CFR § 64.1200(n)(2)(iii), (3). A Final Determination Order may be issued up to one year after release of the Initial Determination Order. *Id.* § 64.1200(n)(2)(iii).

²² See *id.* § 64.1200(n)(3).

²³ See *id.* (citing *id.* § 64.1200(k)(4)).

²⁴ SK Teleco Notice, at *1 & Attachment A (identifying calls that the Company originated); 47 U.S.C. § 227(b)(1)(A) (requiring callers obtain consent before placing certain types of pre-recorded calls); 47 CFR § 64.1200(a)(1)-(2) (same).

Walmart,” and claiming to be alerting the call recipient to an order placed through their Walmart account.²⁵ Specifically, all of the calls stated that a preauthorized order of \$919.45 was placed for a PlayStation 5 and instructed the recipient to “press 1” to cancel the order or to speak with a customer support representative. If a number was not pressed after the message, the prerecorded message continued to repeat until the call recipient pressed a button or the call was terminated.²⁶ Call recipients who reported pressing “1” or returning calls to the caller ID number assert that they were connected with live operators who, in some instances, impersonated a federal agency²⁷ and phished for personally identifiable information, including social security numbers.²⁸

5. During the course of investigating several consumer complaints about these calls, the Bureau requested that the ITG conduct tracebacks on the calls. The results of the tracebacks indicated that SK Teleco was the originating provider for the calls.²⁹ The ITG previously notified SK Teleco of these calls and provided it access to supporting data identifying each call.³⁰ In its response to the ITG, SK Teleco did not contest that it had originated the calls and it did not provide the ITG with proof of the requisite consent for the calls.³¹ SK Teleco certified in its RMD filing, under penalty of perjury, that it would respond within 24 hours to all traceback requests and cooperate with the FCC and the ITG in investigating and stopping any illegal robocallers that use its service to originate calls.³² Between March 31, 2025 and April 11, 2025, SK Teleco failed to respond to traceback requests from the ITG for the 16 calls listed in Attachment B of the Notice.³³ As of today, neither the Bureau nor the ITG has received a response for any of the 16 calls identified in Attachment B of the Notice.³⁴

²⁵ See ITG Subpoena Response (July 23, 2025) (on file at EB-TCD-24-00036937) (ITG July Response); ITG Subpoena Response (Apr. 28, 2025) (on file at EB-TCD-24-00036937) (ITG April Response).

²⁶ See ITG July Response (recording of robocall received on Jan. 31, 2025, traceback no. 22774).

²⁷ *Id.*; FCC Complaint #7761246 (Apr. 4, 2025) (on file at EB-TCD-24-00036937) (“The message repeated itself multiple times in the same voicemail.”); FCC Complaint #7753573 (Apr. 1, 2025) (on file at EB-TCD-24-00036937) (“it was a female voice [sic] recording that would keep repeating itself.”).

²⁸ See SK Teleco Notice, at n.7 (citing to FCC Complaint #7767662 (Apr. 8, 2025) (on file at EB-TCD-24-00036937) (asserting the live operator claimed to work for the Social Security Administration); FCC Complaint #7241814 (Aug. 16, 2024) (on file at EB-TCD-24-00036937) (asserting the live operator claimed to work for the Federal Trade Commission)).

²⁹ See ITG July Response; *see also* SK Teleco Notice, Attachment A (noting the Company’s role as the originating provider for each identified call).

³⁰ See ITG July Response, *supra* note 25.

³¹ *Id.*

³² See SK Teleco LLC Certification (No. RMD0014982), Fed. Comm’n Comm’n, Robocall Mitigation Database (filed Aug. 12, 2024), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=3f92798c1ba8b150680f657ae544bcb2a&view=sp (SK Teleco Listing).

³³ ITG April Response, *supra* note 25.

³⁴ See, e.g., SK Teleco 48-hour Response, *supra* note 4; SK Teleco Final Response *supra* note 4; E-mail from [redacted], Robocall Traceback Fraud Specialist, ITG, to Genesis Monserrate, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau (Mar. 25, 2026, 10:42 AM EDT) (ITG E-mail).

C. SK Teleco's Response to the Notice

6. *SK Teleco's Investigation into Apparent Illegal Robocall Traffic.* SK Teleco provided its first response on December 3, 2025,³⁵ and its final response on December 10, 2025.³⁶ The Company informed the Bureau on December 3, 2025, within the 48-hour deadline, that it had “blocked all ongoing and future traffic from the identified accounts and campaigns associated with the Walmart” calls on April 12, 2025, and “suspended/terminated the affected customer accounts and initiated a review of any related sub-accounts, resellers or affiliated entities . . .”³⁷ The Company claimed to have implemented “enhanced vetting and monitoring of wholesale/reseller customers” which include (a) “[r]equiring clear, documented use cases for outbound calling, particularly for high-volume or campaign-base traffic,” (b) “[p]erforming heightened review of customers that provide ‘lead generation,’ ‘notification,’ ‘order confirmation,’ or similar services, [i]mplement[] tighter thresholds and traffic pattern alerts for high-volume, short-duration, or pre-recorded calls associated with branded or financial transaction-type scripts;” and (c) “[r]eserving the right to require upfront sample call scripts or campaign descriptions for higher-risk use cases.”³⁸

7. The Company claims it “conducted a detailed review of Call detail records (CDRs) and signaling logs for the period referenced in Attachment A, [c]ustomer account configurations associated with the identified traffic; and [a]ny available call recordings, routing data, and internal tickets relating to the affected accounts.”³⁹ Additionally, it claims it “[b]locked further traffic originating from the Customer and all related accounts” and “[t]erminated the relevant trunks and/or credentials used to inject this traffic.”⁴⁰ The corrective measures that the Company stated it implemented included “[t]ermination and blocking of the offending customer,” “[e]nhanced vetting and monitoring of wholesale/reseller customers,” “[s]pam filtering and traceback handling improvements,” and “network-level controls for substantially similar traffic.”⁴¹

8. *SK Teleco's Investigation into Non-Responsive Tracebacks.* For the 16 non-responsive tracebacks, the Company claimed that the traceback requests identified in Attachment B “were sent to an internal compliance email address that, due to an incorrect spam filtering configuration, had been automatically classified as spam/junk.”⁴² As a result, the Company stated that it had “whitelisted known Industry Traceback Group and FCC Enforcement Bureau email domains in our email security and spam filtering tools,” “established internal procedures requiring that all traceback requests be acknowledged and investigated within 24 hours of receipt, consistent with the Notice and Commission rules,” and “conducted an internal review and training with staff to ensure everyone understands the urgency and regulatory significance of traceback communications.”⁴³

9. As to the traceback requests in Attachment B, the Company falsely claimed, in part, that they “completed, or are in the process of completing, responses to each of the 16 calls” and that they have

³⁵ SK Teleco 48-hour Response, *supra* note 4. The Notice warned SK Teleco that it could face permissive blocking from its downstream provider if it “fail[ed] to effectively mitigate illegal traffic within 48 hours or fails to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls.” See 47 CFR § 64.1200(k)(4).

³⁶ SK Teleco Final Response, *supra* note 4.

³⁷ SK Teleco 48-hour Response, *supra* note 4, at 1.

³⁸ SK Teleco Final Response, *supra* note 4, at 4.

³⁹ *Id.* at 1.

⁴⁰ *Id.* at 2.

⁴¹ *Id.* at 3.

⁴² *Id.* at 1.

⁴³ *Id.*

identified their role in the call path and identified their customer.⁴⁴ Despite these assertions, the Company failed to identify its role in the call path for each of the 16 calls and failed to identify the customer(s) associated with all 16 calls.⁴⁵ This information is missing from the Company's 48-hour or final response, and the ITG portal.

III. DISCUSSION

10. The Bureau issued the SK Teleco Notice to the Company on December 2, 2025.⁴⁶ The SK Teleco Notice directed the Company to take the following actions: (i) promptly investigate the identified suspected illegal traffic; (ii) block the identified traffic within 14 days (and continue to block the identified traffic as well as substantially similar traffic on an ongoing basis) unless it determined that the traffic was not illegal; and (iii) report the results of the Company's investigation to the Bureau within 14 days.⁴⁷ The report must include a certification that the Company is blocking the identified traffic and will continue to do so.⁴⁸ The Notice further required SK Teleco to “*respond fully* to the 16 tracebacks requested in Attachment B within 14 days of the date of the [Notice].”⁴⁹ The SK Teleco Notice warned that if the Company did not adequately respond to the Notice, it could face permissive blocking under section 64.1200(k)(4),⁵⁰ mandatory blocking under 64.1200(n)(2),⁵¹ and removal from the RMD for failure to respond fully to the 16 tracebacks requested,⁵² which would separately require downstream providers to block the Company's traffic under section 64.6305(g) of the Commission's rules.⁵³

11. SK Teleco did not adequately respond to the Notice.⁵⁴ The Company provided two responses, one on December 3, 2025, and the final response on December 10, 2025.⁵⁵ In both responses, SK Teleco did not respond fully to the 16 tracebacks identified in Attachment B. The Company said that it “completed, or [is] in the process of completing, responses to each of the 16 calls” and has “identified their role in the call path, identified their customer, and documented the corrective measures.”⁵⁶ However, SK Teleco's response to the 16 tracebacks cannot be found in either one of their responses. The Bureau confirmed with the ITG that the Company had not completed the traceback responses.⁵⁷ Thus, we conclude that SK Teleco has failed to sufficiently respond to the specific requirements of the Notice. Separately, Commission rules require that the provider include in its report a “certification that it is blocking the identified traffic and will continue to do so.”⁵⁸ Here, we find that the Company's assertions that it blocked the identified illegal traffic and implemented preventative measures do not meet

⁴⁴ *Id.* at 4-5.

⁴⁵ See ITG E-mail, *supra* note 34 (confirming that SK Teleco had not updated the tracebacks).

⁴⁶ SK Teleco Notice.

⁴⁷ *Id.* at 5.

⁴⁸ *Id.*

⁴⁹ *Id.* at 7 (emphasis added).

⁵⁰ 47 CFR § 64.1200(k)(4).

⁵¹ *Id.* § 64.1200(n).

⁵² The SK Teleco Notice warned that failure to respond to the 16 tracebacks could lead to the Bureau “releas[ing] an order concluding that the Company's filing is deficient and directing it to explain, within 14 days, why the Company's certification should not be removed from the RMD.” See SK Teleco Notice 7-8.

⁵³ See SK Teleco Notice at 4-8888; 47 CFR § 64.6305(g).

⁵⁴ See SK Teleco 48-hour Response, *supra* note 4; SK Teleco Final Response, *supra* note 4.

⁵⁵ See *Id.*

⁵⁶ See SK Teleco 48-hour Response, *supra* note 4; SK Teleco Final Response, *supra* note 4.

⁵⁷ ITG E-mail, *supra* note 34.

⁵⁸ 47 CFR § 64.1200(n)(2)(A)(i)(A)(1).

the “certification” rules under section 64.1200(n)(2)(A)(i)(A)(1).⁵⁹ In sum, the Company failed to adequately respond to the Notice.

12. The Bureau now provides SK Teleco the final opportunity to file a response to this Initial Determination Order. The final response should address whether the Company is in compliance with section 64.1200(n)(2) of the Commission’s rules, including obligations triggered by the SK Teleco Notice.⁶⁰ If it chooses to file a final response, the Company must file its response with the Bureau within 14 calendar days of the release date of this Initial Determination Order. Failure to respond to this Initial Determination Order with an adequate response, or continued origination or allowance onto the U.S. network of substantially similar traffic, will result in the Bureau issuing a Final Determination Order.⁶¹ The Final Determination Order will be published in EB Docket No. 22-174 and will serve as notification to all immediate downstream providers that they must block and cease accepting all traffic received directly from SK Teleco beginning 30 calendar days after the release of the Final Determination Order.⁶² In addition, failure to respond to this Initial Determination Order will result in the Bureau issuing an Order removing the Company’s certification from the RMD, which will require all downstream providers to immediately cease accepting calls directly from the Company.⁶³ 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.⁶⁴

IV. ORDERING CLAUSES

13. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227(b), 251(e), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227(b), 251(e), 403; sections 0.111, 0.311, 1.1, and 64.1200(n) of the Commission’s rules, 47 CFR §§ 0.111, 0.311, 1.1, 64.1200(n), 64.6305(g),⁶⁵ SK Teleco LLC **SHALL FILE** any written final response to this Initial Determination Order **within 14 calendar days** from the release date of this Initial Determination Order.⁶⁶

14. Any 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 emailed to Daniel Stepanicich, Division Chief, Telecommunications Consumers Division, at Daniel.Stepanicich@fcc.gov, and Genesis Monserrate, Attorney Advisor, Telecommunications Consumers Division, at Genesis.Monserrate@fcc.gov.

15. **IT IS FURTHER ORDERED** that, pursuant to section 1.102(b)(1) of the Commission’s rules, 47 CFR § 1.102(b)(1), this Initial Determination Order **SHALL BE EFFECTIVE** upon release.

16. **IT IS FURTHER ORDERED** that copies of this Initial Determination Order shall be filed in EB Docket No. 22-174 and sent by email and certified mail, return receipt requested, to: Anupam

⁵⁹ 47 CFR § 1.16.

⁶⁰ See 47 CFR § 64.1200(n)(2)(ii)-(iii); see also SK Teleco Notice, at *5 (describing the actions the Company must take in response to the SK Teleco Notice).

⁶¹ 47 CFR § 64.1200(n)(2)(iii).

⁶² *Id.* § 64.1200(n)(3). “A provider that chooses to initiate blocking sooner than 30 days from the release date may do so consistent with [section 64.1200(k)(4) of the Commission’s rules].” *Id.*

⁶³ See *id.* § 64.6305(g).

⁶⁴ See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, 2597, para. 46 & n.173 (2023).

⁶⁵ *Id.* at 2604, para. 60.

⁶⁶ *Id.* § 64.1200(n)(2)(ii).

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FEDERAL COMMUNICATIONS COMMISSION

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