

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

In the Matter of
Mexico IP Phone LLC
EB-TCD-26-00040954

ORDER TO SHOW CAUSE

Adopted: June 11, 2026

Released: June 11, 2026

By the Chief, Enforcement Bureau:

I. INTRODUCTION

1. By this Order to Show Cause (Order), the Enforcement Bureau (Bureau) of the Federal Communications Commission (Commission or FCC) finds that Mexico IP Phone’s (Mexico IP or the Company) Robocall Mitigation Database (RMD) certification is apparently deficient and directs Mexico IP to show cause why it should not be removed from the RMD. The Bureau finds the Company’s certification is apparently deficient because it lacks required information. Furthermore, the Bureau finds that Mexico IP’s certification is apparently willfully deficient because the Company intentionally recertified its RMD Certification without the required information in an apparent attempt to advance a scheme to illegally obtain direct access to numbers. Failure to respond to this Order within 10 days will result in removal of Mexico IP’s certification from the RMD, in which case all voice service providers and intermediate providers will be required to cease accepting calls directly from Mexico IP.

II. BACKGROUND

A. RMD Certification Rules and Removal Procedures

2. The FCC established the RMD in 2020 to promote transparency and effective robocall mitigation. Voice service providers, gateway providers, and non-gateway intermediate providers must file certifications in the RMD. RMD certifications must describe the specific reasonable steps the provider is taking to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program. RMD certifications must include a commitment to respond to all traceback requests from the Commission and to cooperate with the Commission in investigating and stopping any illegal

1 47 CFR § 64.6305(g); Call Authentication Trust Anchor, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, at 2604-05, para. 62 (2023) (Sixth Caller ID Authentication Order).

2 Call Authentication Trust Anchor, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902-03, paras. 82-83 (2020) (Second Caller ID Authentication Order).

3 47 CFR § 64.6305(d), (e), (f). Paragraph (d) applies to voice service providers; paragraph (e) applies to gateway providers; and paragraph (f) applies to non-gateway intermediate providers. For purposes of this section, the term “voice service provider” is based on the definition of “voice service” in 47 CFR § 64.6300(o) that applies to the RMD requirements in 47 CFR § 64.6305. The terms “gateway provider” and “non-gateway intermediate provider” are defined in 47 CFR § 64.6300(d) and (i).

4 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

robocallers that use its service to originate, carry, or process calls.⁵ RMD certifications must state whether the provider has, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the provider transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing; and, if so, provide a description of any such action or investigation, including all law enforcement or regulatory agencies involved, the date that any action or investigation was commenced, the current status of the action or investigation, a summary of the findings of wrongdoing made in connection with the action or investigation, and whether any final determinations have been issued.⁶ When completing the RMD certification form in the RMD Database, providers must identify their “[p]rincipals, affiliates, subsidiaries, and parent companies.”⁷ Each provider must identify at least one principal, who must be an individual.⁸ An officer of the provider filing a certification in the RMD must declare, under penalty of perjury, that the information included in the certification is true and correct.⁹ The submission of false or inaccurate information makes a certification deficient and may result in an enforcement action against the filer, including removal of the certification from the RMD.¹⁰

3. The Commission may remove a provider’s certification from the RMD that it finds “deficient in some way.”¹¹ Generally, RMD removal is a three step process.¹² However, when a provider willfully violates the Commission’s rules, its certification may be removed from the RMD under a two-

⁵ 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(ii).

⁶ 47 CFR § 64.6305(d)(2)(iv), (e)(2)(iv), (f)(2)(iv).

⁷ See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2597, para. 46, and fn. 176 (delegating authority to the Wireline Bureau to determine the form and format of RMD filings, including as it pertains to disclosure of enforcement actions and principals and affiliates). See also *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, 386-87, fn.20 (RMD Public Notice).

⁸ FCC, *Robocall Mitigation Database Frequently Asked Questions for Filers* (Jan. 20, 2026), <https://www.fcc.gov/sites/default/files/rmd-faq.pdf> (RMD FAQs) (explaining that “[w]hile a filer may not have any affiliates, subsidiaries, or parent companies, every RMD filer must identify at least one principal, who must be an individual, on the RMD submission form to provide the Commission with sufficient detail regarding the filer’s ownership and management.”).

⁹ 47 CFR § 64.6305(d)(3)(ii), (e)(3)(ii), (f)(3)(ii).

¹⁰ See *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (noting that if a certification “is deficient in some way,” the Commission may take enforcement action as appropriate, including “removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing”); *Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40 (discussing RMD enforcement actions against gateway providers); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 57 (discussing RMD enforcement actions against non-gateway intermediate providers). The Commission may also 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, 40 FCC Rcd 599, 606, para. 18 (2025) (adopting a \$10,000 base forfeiture for submitting false or inaccurate information to the RMD); see also *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2590, para. 31 (“[A] provider’s program is ‘sufficient if it includes detailed practices that can reasonably be expected to significantly reduce’ the carrying or processing (for intermediate providers) or origination (for voice service providers) of illegal robocalls. Each provider ‘must comply with the practices’ that its program requires, and its program is insufficient if the provider ‘knowingly or through negligence’ carries or processes calls (for intermediate providers) or originates (for voice service providers) unlawful robocall campaigns.” (citations omitted)).

¹¹ *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83; *Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40; *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

¹² See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

step, expedited procedure.¹³ An action “is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements.”¹⁴ *First*, the Bureau will give notice to the provider, informing it that its certification is deficient and represents a willful violation, explain the nature of the deficiency and the willful violation, and allow 10 days for the provider to cure the deficiency or explain why its certification is not deficient.¹⁵ *Second*, if the provider fails to cure or establish that there is no deficiency within the 10-day period, the Bureau will release an order removing the provider’s certification from the RMD.¹⁶

4. Under the Commission’s rules, intermediate providers and voice service providers shall accept calls directly from a domestic voice service provider, gateway provider, or non-gateway intermediate provider only if that provider’s certification appears in the RMD.¹⁷ Removal of a provider’s certification from the RMD therefore requires all intermediate providers and voice service providers to cease accepting all calls directly from the provider.¹⁸

B. Direct Access to Numbers Application Process

5. The Commission has exclusive jurisdiction over those portions of the North American Numbering Plan related to the United States.¹⁹ The NANPA is the impartial, non-government entity that administers number resources in accordance with Commission rules and regulations.²⁰ In 2015, the Commission established a multi-step process for interconnected VoIP providers to obtain United States telephone numbers directly from the NANPA.²¹ In 2023, the Commission updated and enhanced the application process.²² The Commission continues to strengthen the protections built into the numbering authorization process in order to provide critical defense from the risks associated with bad actors

¹³ *Id.* at 2604-05, para. 62 (describing the two-step expedited procedure and explaining that it applies to situations where a provider “has ‘willfully’ violated its Robocall Mitigation Database filing obligations 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”). See *Chase Tech Ilc*, Order, 40 FCC Rcd 7204 (EB 2025) (*Chase Tech Order*) (removing a provider from the RMD under the two-step, expedited procedure for submitting false data in its RMD certification). In the *Sixth Caller ID Report and Order*, the Commission concluded that where a provider’s certification is facially deficient—that is, it fails to submit any information regarding the “specific reasonable steps” it is taking to mitigate illegal robocalls—it has “willfully” violated the RMD rules and expedited removal is warranted. *Sixth Caller ID Authentication Report and Order*, 38 FCC Rcd at 2604, para. 61. Although, in that *Order*, the Commission applied its willful violation analysis to facially deficient certifications specifically, it did not preclude a determination that other types of deficiencies could be considered willful violations.

¹⁴ *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)). See *Chase Tech Order*, 40 FCC Rcd at 7206, para. 7 (finding a provider’s actions willful where it submitted false information to the RMD).

¹⁵ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2605, para. 62.

¹⁶ *Id.*

¹⁷ 47 CFR § 64.6305(g).

¹⁸ See *id.*

¹⁹ 47 U.S.C. 251(e)(1).

²⁰ 47 CFR § 52.13(a)-(d).

²¹ *Numbering Policies for Modern Communications et al.*, CC Docket Nos. 99-200, 95-116, and 01-92; WC Docket Nos. 13-97, 10-90, 07-243, and 04-36, Report and Order, 30 FCC Rcd 6839 (2015) (*First Direct Access Order*).

²² *Numbering Policies for Modern Communications et al.*, IB Docket No. 16-155; WC Docket Nos. 20-67, 13-97, and 07-243, Second Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd 8951, 8981-85 paras. 59-67 (2023) (*Second Numbering Order*).

accessing United States numbering resources, most recently by taking action to enhance the anti-robocalling compliance required of new and existing applicants.²³

6. A provider seeking direct access to numbers from the NANPA must first obtain Commission authorization.²⁴ Among other requirements, the application for Commission authorization must be filed in a designated non-docketed inbox on the Commission's Electronic Comment Filing System and be accompanied by a fee.²⁵ The applicant must also certify that it "will not use the numbers obtained pursuant to an authorization . . . to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations," and "that the applicant has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database."²⁶ Wireline Competition Bureau (Wireline Bureau) staff review the application for sufficiency and then, if it satisfies initial procedural review, release an Accepted-For-Filing Public Notice in a case-specific docket created for the application.²⁷ The application is only deemed granted on the 31st day after the Accepted-For-Filing Public Notice is released, unless the Wireline Bureau notifies the applicant that the grant will not be automatically effective.²⁸ If the grant is effective, the Wireline Bureau releases a Notice of Interconnected VoIP Numbering Authorization noting the effective date the authorization is granted.²⁹ Once the authorization is granted, the provider may then apply to the NANPA for direct access to numbers.

C. Mexico IP Phone

7. Mexico IP is a voice service provider.³⁰ Mexico IP first filed a certification in the RMD on December 5, 2024, and recertified its certification on February 24, 2026.³¹ In its certification, when directed to identify its "principals, affiliates, subsidiaries, and parent companies", the Company only identified "Mexico IP Phone".³² Additionally, the company stated it was not the subject of a Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing in the prior two years.³³ Hemant Kumar Bharti, Mexico IP's CEO, signed the certification under penalty of perjury that the information was correct and true.³⁴

²³ See *Numbering Policies for Modern Communications et al.*, WC Docket Nos. 20-67, 13-97, and 07-243, Third Report and Order and Third Further Notice of Proposed Rule Making, FCC 25-86 (Dec. 19, 2025) (amending the Commission's rules to require all pre-existing authorization holders to comply with the requirements, however compliance with those amendments is delayed pending approval by the Office of Management and Budget).

²⁴ *First Direct Access Order*, 30 FCC Rcd at 6849, para. 22.

²⁵ 47 CFR § 52.15(g)(3)(iii); *First Direct Access Order*, 30 FCC Rcd at 6857, para. 38. The other application requirements are enumerated in section 52.15(g)(3)(ii) of the Commission's rules. 47 CFR § 52.15(g)(3)(ii); see *First Direct Access Order*, 30 FCC Rcd at 6858-63, paras. 42-50.

²⁶ See 47 CFR § 52.15(g)(3)(ii)(D); *Second Numbering Order*, 38 FCC Rcd at 8957-60, paras. 13-15.

²⁷ 47 CFR § 52.15(g)(3)(iv); *First Direct Access Order*, 30 FCC Rcd at 6858, para. 39.

²⁸ 47 CFR § 52.15(g)(3)(iv); *First Direct Access Order*, 30 FCC Rcd at para. 40.

²⁹ See, e.g., *Notice of Interconnected VoIP Numbering Authorizations Granted*, WC Docket No. 25-204, Public Notice, DA 26-162 (WCB Feb. 17, 2026).

³⁰ Mexico IP Phone (No. RMD0024474), FCC, Robocall Mitigation Database (filed Feb. 24, 2026) (Mexico IP RMD Certification).

³¹ *Id.*

³² *Id.*

³³ *Id.*

³⁴ *Id.*

8. On August 7, 2025, the Anti-Robocall Multistate Litigation Task Force (Task Force) sent Hemant Kumar Bharti a letter (Task Force Letter) notifying Mexico IP that the Task Force found the Company to be immediately downstream of non-responsive voice service providers in at least 40 tracebacks of illegal or suspicious calls.³⁵ The Task Force Letter stated that “Mexico IP accepted and transmitted high-volume illegal and/or suspicious call traffic—which has reached U.S. consumers and, presumably, generated revenue for Mexico IP—from providers that have failed to respond to traceback requests in contravention of the FCC’s mandates.”³⁶ The letter went on to state that “Mexico IP is likely causing [or] facilitating significant volumes of illegal [or] suspicious robocalls to ultimately reach U.S. consumers[.]”³⁷ The Company apparently took no action in response to the Task Force Letter because on December 2, 2025, the Bureau found that Mexico IP was “closely affiliated” with another voice service provider “in transmitting Walmart impersonation robocalls.”³⁸

D. Mexico IP’s Attempt to Seek Direct Access to Numbers

9. On February 4, 2026, Mexico IP filed a document titled “Application for Authorization to Obtain Direct Access to Telephone Numbers” (the “Application”) directly into WC Docket No. 13-97, a rule making docket.³⁹ The company did not file the “Application” in the designated non-docketed inbox for direct access authorizations or pay the required filing fee. The Company submitted no other documents or information to the Commission or Wireline Bureau and the Wireline Bureau had no communications with the Company. The Wireline Bureau took no action with regards to the “Application” and did not release an Accepted-For-Filing Public Notice for Mexico IP because the “Application” was not properly filed.

10. On February 25, 2026, the NANPA notified Wireline Bureau staff that Mexico IP submitted an application to the NANPA for direct access that included a document purporting to be a Notice of Interconnected VoIP Numbering Authorization for the Company (the Purported Notice).⁴⁰ The Purported Notice was numbered DA 26-8 and stated it was released in WC Docket No. 13-97 on February 5, 2026.⁴¹ The Purported Notice also stated the effective grant date for Mexico IP was February 5, 2026.⁴² The Wireline Bureau never issued the Purported Notice.⁴³ However, the Wireline Bureau did release a Notice of Interconnected VoIP Numbering Authorization numbered DA 26-8 in WC Docket No. 25-118 on January 2, 2026, that granted direct access authorization to a company called DayStarr, LLC

³⁵ Letter from Jeff Jackson, Attorney General, and Tracy Nayer, Special Deputy Attorney General, North Carolina Department of Justice, to Hemant Kumar Bharti, CEO, Mexico IP Phones LLC, at 4 (Aug. 7, 2025) (on file in EB-TCD-26-00040954) (Task Force Letter). The Anti-Robocall Multistate Litigation Task Force is a 51-member bipartisan collective of State Attorneys General, led by the Attorneys General of Indiana, North Carolina, and Ohio, which is focused on actively investigating and pursuing enforcement actions against various entities in the robocall ecosystem that are identified as being responsible for significant volumes of illegal and fraudulent robocall traffic routed into and across the county. *Id.* at 1, n.1.

³⁶ Task Force Letter at 4.

³⁷ *Id.*

³⁸ Letter from Patrick Webre, Acting Chief, Enforcement Bureau, FCC, to Saurabh Rajput, CEO, SK Teleco LLC, at 3 (Dec. 2, 2025) (on file in EB-TCD-26-00040498) (SK Teleco Letter).

³⁹ Mexico IP Phone LLC, Application For Authorization to Obtain Direct Access to Telephone Numbers, WC Docket No. 13-97 (on file in EB-TCD-26-00040954) (Mexico IP Application).

⁴⁰ Mexico IP, Purported Public Notice (on file in EB-TCD-26-00040954) (Mexico IP Purported Notice).

⁴¹ *Id.*

⁴² *Id.*

⁴³ As described in Section II.B above, the Wireline Bureau’s procedures for processing direct access applications would never result in an application being granted the same day that it was filed.

(the DayStarr Notice) with an effective date of January 2, 2026.⁴⁴ The text of the Purported Notice and the DayStarr Notice are identical except for Mexico IP's name, the Commission dockets in which the Company supposedly filed its application and the Purported Notice was released, and the purported effective grant and release dates.⁴⁵

III. DISCUSSION

A. Mexico IP's RMD Certification Lacks Required Information and is Apparently Deficient

11. The Bureau finds that Mexico IP's RMD certification is apparently deficient because the Company failed both to identify an individual principal of the Company, and that it was the subject of a law enforcement investigation in the past two years. The Commission collects information about prior law enforcement actions and principals to facilitate the Commission's ability to determine whether a provider has been prohibited from filing in the Robocall Mitigation Database and to impose consequences on repeat offenders of the Commission's robocall mitigation rules.⁴⁶ Mexico IP was required to identify a principal, who is an individual person, in the RMD certification it filed on February 24, 2026.⁴⁷ Mexico IP identified its only principal as "Mexico IP Phone."⁴⁸ Mexico IP Phone is not an individual person. By not identifying an individual, the Company obstructs the Commission's ability to determine whether the Company's ownership or management has been prohibited from filing in the RMD.

12. The Commission's rules also required the Company to identify if it was the subject of any Commission or law enforcement action or investigation with accompanying findings of actual or suspected wrongdoing in the last two years.⁴⁹ In its February 24, 2026, RMD recertification, the Company answered that it was not.⁵⁰ However, Mexico IP Phone was the subject of the August 7, 2025, Task Force Letter.⁵¹ The *Sixth Caller ID Authentication Order* distinguished between a "written notice or other instrument containing findings of wrongdoing" and "inquiries or investigations that do not contain findings of actual or suspected wrongdoing."⁵² Only the former requires reporting to the RMD.⁵³ The Task Force is a law enforcement entity comprised of 51 State Attorneys General and the Task Force Letter constitutes a written notice containing findings that Mexico IP accepted and transmitted "significant volumes" of illegal call traffic.⁵⁴ Therefore, Mexico IP should have identified the Task Force Letter in its February 24, 2026, certification. By not providing the required information, Mexico IP

⁴⁴ *Notice of Interconnected VoIP Numbering Authorizations Granted*, WC Docket No. 25-118, DA 26-8 (WCB Jan. 2, 2026) (DayStarr Notice). DayStarr has no relationship with Mexico IP.

⁴⁵ *Compare* Mexico IP Purported Notice, *with* DayStarr Notice.

⁴⁶ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2596, para. 46; RMD Public Notice, 39 FCC Rcd at 386-87, fn.20.

⁴⁷ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2597, para. 46; RMD FAQs.

⁴⁸ Mexico IP RMD Certification.

⁴⁹ 47 CFR § 64.6305(d)(2)(iv).

⁵⁰ Mexico IP RMD Certification.

⁵¹ Task Force Letter.

⁵² *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2598, para. 47. Examples of findings of wrongdoing include notices of apparent liability, forfeiture orders, civil lawsuits, criminal indictments, and cease-and-desist notices. *Id.* Examples of inquiries or investigations include traceback requests, Bureau letters of inquiry or subpoenas, or investigative demand letters issued by a regulatory or law enforcement agency. *Id.*

⁵³ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2598, para. 47.

⁵⁴ Task Force Letter at 4.

hinders the Bureau's authority to effectively enforce the Commission's anti-robocalling rules.⁵⁵ Accordingly, the Bureau finds that Mexico IP's RMD certification is apparently deficient as it contains incomplete or false information with respect to two separate certification requirements.

B. Mexico IP Apparently Falsified a Commission Notice of Interconnected VoIP Numbering Authorization

13. Mexico IP apparently falsified a Notice of Interconnected VoIP Numbering Authorization and submitted it to the NANPA. On February 25, 2026, the NANPA notified the Wireline Bureau that Mexico IP submitted the Purported Notice as part of an application for direct access to United States telephone numbers. The Wireline Bureau never issued the Purported Notice. The Wireline Bureau did, however, release the DayStarr Notice. Given the similarities between the documents, the Bureau finds that Mexico IP apparently altered the DayStarr Notice to create the Purported Notice. Furthermore, Mexico IP apparently created the Purported Notice in order to give the appearance that the Wireline Bureau granted authorization to the Company so that it could apply to the NANPA for direct access to numbers.

14. The totality of the circumstances suggest that Mexico IP's "Application" and the Purported Notice were part of an intentional scheme to circumvent the Commission's defenses against robocallers gaining direct access to numbers. The Company submitted the "Application" on February 5, 2026, without following any of the procedural requirements for a properly filed application.⁵⁶ Significantly, the Wireline Bureau never issued an Accepted-For-Filing public notice that would have publicly announced that the Company's application satisfied initial procedural requirements, created a case-specific docket for the Company, and started the 31-day clock for an automatic grant of the authorization. The Company could not reasonably have believed its application had been accepted or that an authorization for direct access was granted because an Accepted-For-Filing public notice was never released, and the grant process itself takes a minimum of 31 days. Instead, the Company apparently filed "the Application" in a public rulemaking docket in an apparent attempt to make it appear as if the Wireline Bureau had released an Accepted-for-Filing public notice in its own case specific docket. The Company then used that same docket number and date in the Purported Notice. The Bureau finds Mexico IP apparently took these steps to give legitimacy to the Purported Notice in order to deceive the NANPA into granting the Company direct access to numbers.

C. Mexico IP Apparently Willfully Violated the RMD Filing Rules

15. The Bureau finds that it is highly likely that Mexico IP intentionally, and therefore willfully, recertified its RMD Certification with the deficiencies identified above in an apparent attempt to advance its scheme to illegally obtain direct access to numbers. On February 4, 2026, the Company filed its spurious "Application" with the Commission.⁵⁷ Then, on February 24, 2026, the Company recertified its RMD certification and failed to include required information about prior law enforcement actions and principals.⁵⁸ Finally, on February 25, 2026, the Company submitted the Purported Notice to the NANPA.⁵⁹ The Commission's rules require that an applicant for a VoIP numbering authorization certify that it will not use numbers to knowingly transmit, encourage, assist, or facilitate illegal robocalls.⁶⁰ An applicant must also certify to compliance with the Commission's robocall mitigation program

⁵⁵ See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2596, para. 46.

⁵⁶ Mexico IP Application. See 47 CFR § 52.15(g)(3)(ii) (describing the proper application process).

⁵⁷ Mexico IP Application.

⁵⁸ Mexico IP RMD Certification.

⁵⁹ Mexico IP Purported Notice.

⁶⁰ 47 CFR § 52.15(g)(3)(ii)(C).

requirements and file a certification in the RMD.⁶¹ By recertifying its RMD certification without the required information about its principals and prior law enforcement actions, Mexico IP apparently sought to satisfy the RMD certification requirement and avoid any red flags that might have been raised over its history of accepting and transmitting illegal traffic.⁶² The timing of Mexico IP's RMD recertification—nineteen days after it submitted “the Application” to the Wireline Bureau and one day before submitting the Purported Notice to the NANPA—suggests the Company's actions were part of an intentional scheme and not coincidental.

16. An action “is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements.”⁶³ Mexico IP intentionally recertified its RMD certification with missing information in order to advance its direct access to numbers scheme. As described above, the missing information renders Mexico IP's RMD Certification deficient. Accordingly, because Mexico IP intentionally filed a deficient RMD certification, the Bureau find that its certification is willfully deficient.

D. Mexico IP Must Show Cause why it Should not be Removed from the RMD

17. The Bureau directs Mexico IP to explain why the Bureau should not remove the Company's certification from the RMD.⁶⁴ This Order affords Mexico IP notice and an opportunity to cure its deficiency by responding fully to the issues raised in the Order, in accordance with its certification and as required by section 64.6305(d)(2)(iii) of the Commission's rules.⁶⁵ Alternatively, the Company may explain why its certification is not willfully deficient.⁶⁶

18. Mexico IP shall file its response with the Bureau within 10 calendar days of the date of this Order.⁶⁷ Failure to respond and correct the deficiency, or provide a sufficient explanation for why Mexico IP should retain its certification in the RMD will result in removal of the certification and accompanying filing.⁶⁸ Removal of Mexico IP's certification from the RMD will require all voice service providers and intermediate providers to cease accepting calls directly from Mexico IP.⁶⁹ If Mexico IP is removed from the RMD, it shall not be permitted to refile unless and until both the Bureau and the Commission's Wireline Competition Bureau consent.

IV. ORDERING CLAUSES

19. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227b, 251(e), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227b, 251(e), 403; sections 0.111, 0.311, 1.1, and 1.102(b)(1) of the Commission's rules, 47 CFR §§ 0.111, 0.311, 1.1, and

⁶¹ *Id.* § 52.15(g)(3)(ii)(D).

⁶² *See* Task Force Letter at 4.

⁶³ *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)). *See Chase Tech Order*, 40 FCC Rcd at 7206, para. 7 (finding a provider's actions willful where it submitted false information to the RMD).

⁶⁴ *See Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (“Enforcement Actions may include, among others, removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing . . .”).

⁶⁵ *See* 47 CFR § 64.6305(d)(2)(iii).

⁶⁶ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2598, para. 62.

⁶⁷ *See id.*

⁶⁸ *See id.*

⁶⁹ 47 CFR § 64.6305(g)(1).

1.102(b)(1); and the *Sixth Caller ID Authentication Order*⁷⁰ Mexico IP **SHALL FILE** a written response to the Order **within 10 calendar days** from the release date of this Order.⁷¹

20. 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 the FCC Enforcement Bureau, Telecommunications Consumers Division at EnforcementBureauTCD@fcc.gov.

21. **IT IS FURTHER ORDERED** that copies of this Show Cause shall be sent by email and certified mail, return receipt requested, to Hemant Kumar Bharti, Mexico IP Phone, 8206 Louisiana Blvd. NE, Ste. A 4666, Albuquerque, NM 87113 and admin@mexicoipphone.com.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre
Chief
Enforcement Bureau

⁷⁰ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, paras. 60-62.

⁷¹ *See id.* at para. 62.