

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

In the Matter of)
SK Teleco LLC) EB-TCD-24-000371691
) EB Docket No. 22-174
)

FINAL DETERMINATION ORDER AND REMOVAL ORDER

Adopted: June 12, 2026

Released: June 12, 2026

I. INTRODUCTION

1. By this Final Determination Order and Removal Order, the Enforcement Bureau (Bureau) finds that SK Teleco LLC (SK Teleco or Company) has not complied with the requirements of section 64.1200(n)(2) of the Federal Communications Commission’s (Commission or FCC) rules for voice service providers.2 All providers immediately downstream of SK Teleco must block and cease accepting all traffic from SK Teleco beginning 30 calendar days after the release of this Final Determination Order.3 In addition, providers may initiate blocking sooner than 30 calendar days from the release of this Final Determination Order.4 Furthermore, by this Removal Order, the Bureau removes the certification of SK Teleco from the Robocall Mitigation Database (RMD). Removal of SK Teleco’s certification from the RMD requires all intermediate providers and voice service providers to cease accepting all calls directly from the Company.5 SK Teleco shall not re-file an RMD certification without the prior approval of the Bureau and the Wireline Competition Bureau (WCB). This Final Determination Order follows the Bureau’s December 2, 2025, Notification of Suspected Illegal Traffic (Notice),6 and the Bureau’s April 20, 2026, Initial Determination Order and Order to Show Cause (Initial Determination Order).7 SK Teleco responded to the Notice on December 3, 2025, and December 10, 2025, but the Company did not

1 The investigation began under EB-TCD-24-00036937 and was subsequently assigned File No. EB-TCD-24-00037169. Any future correspondence with the Commission concerning this matter should reflect the new case number

2 See 47 CFR § 64.1200(n)(2).

3 Id. § 64.1200(n)(3).

4 Id.; see id. § 64.1200(k)(4). If a provider determines that SK Teleco has failed to effectively mitigate illegal traffic or failed to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls, it may permissively block SK Teleco’s traffic sooner than 30 days upon providing the Commission with notice and a brief summary of the basis for its determination.

5 See 47 CFR § 64.6305(g).

6 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)

7 SK Teleco, LLC, EB Docket No. 22-174, Initial Determination Order and Order to Show Cause, DA 26-384 (EB Apr. 20, 2026) (Initial Determination Order).

provide a sufficient response to the Notice, and did not respond to the Initial Determination Order.⁸ As a result, SK Teleco is not in compliance with section 64.1200(n) of the Commission's rules.⁹

II. BACKGROUND

A. Legal Framework for Mandatory Blocking Rules

2. Protecting consumers in the United States from the dangers and risks of illegal robocalls is the Commission's top consumer protection priority.¹⁰ To further that mission, *all* voice service providers must meet several obligations, including responding to traceback requests within 24 hours and blocking illegal traffic.¹¹ Traceback request responses are essential to identifying callers placing illegal calls and voice service providers facilitating the calls.¹² 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.¹³ Voice service providers are also required to certify in the 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.¹⁴ 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.¹⁵

⁸ See generally Letter from Saurabh Rajput, Chief Executive Officer, SK Teleco LLC, to FCC Enforcement Bureau (Dec. 3, 2025) (on file in EB-TCD-24-00037169) (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-24-00037169) (SK Teleco Final Response).

⁹ See 47 CFR § 64.1200(n)(1)-(2).

¹⁰ *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).

¹¹ *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*).

¹² *Id.* at 5412.

¹³ 47 CFR § 64.1200(n)(2)(i).

¹⁴ *Id.* § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(iii).

¹⁵ 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.

3. The call blocking framework is a three-step process. *First*, providers receive a notification of suspected illegal traffic from the Bureau requiring the provider to investigate the suspected illegal traffic and report the results of the investigation to the Bureau.¹⁶ *Second*, if the provider fails to respond to the notification; the Bureau determines that the response is insufficient; the Bureau determines that the provider is continuing to originate substantially similar traffic; or the Bureau determines that the traffic is illegal despite assertions by the provider, then the Bureau shall issue an Initial Determination Order, pursuant to the Commission's rules.¹⁷ The provider has an opportunity to respond.¹⁸ *Third*, if the Bureau determines that the provider's response to the Initial Determination Order is inadequate (including instances where the provider fails to respond), or if it continues to transmit substantially similar traffic, the Bureau may issue a Final Determination Order mandating all immediate downstream providers to block and cease accepting all traffic that they receive from the provider starting 30 days from release of the Final Determination Order.¹⁹ To provide notification to all downstream providers, the Bureau publishes each Final Determination Order in EB Docket No. 22-174.²⁰ 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.²¹

B. SK Teleco's Origination of 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 violation of section 227(b)(1)(A) of the Communications Act of 1934, as amended, and the Commission's rules.²² These calls purported to be from either "Mary" or "Kimberly," both "from Walmart," and claiming to be alerting the call recipient to an order placed through their Walmart account.²³ 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.²⁴ 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 agency²⁵ and phished for personally identifiable information, including social security numbers.

¹⁶ See 47 CFR § 64.1200(n)(2)(i)(A).

¹⁷ *Id.* § 64.1200(n)(2)(ii).

¹⁸ *Id.*

¹⁹ See *id.* § 64.1200(n)(2)(iii) (permitting issuance of a Final Determination Order up to one year after release of the Initial Determination Order).

²⁰ See *id.* § 64.1200(n)(3).

²¹ See *id.* (citing *id.* § 64.1200(k)(4)).

²² 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).

²³ See generally ITG Subpoena Response (July 23, 2025) (on file at EB-TCD-24-00037169) (ITG July Response); ITG Subpoena Response (Apr. 28, 2025) (on file at EB-TCD-24-00037169) (ITG April Response).

²⁴ See ITG July Response (recording of robocall received on Jan. 31, 2025, traceback no. 22774).

²⁵ *Id.*; FCC Complaint #7761246 (Apr. 4, 2025) (on file at EB-TCD-24-00037169) ("The message repeated itself multiple times in the same voicemail."); FCC Complaint #7753573 (Apr. 1, 2025) (on file at EB-TCD-24-00037169) ("it was a female voice [sic] recording that would keep repeating itself."); see SK Teleco Notice, at n.7 (citing to FCC Complaint #7767662 (Apr. 8, 2025)) (on file at EB-TCD-24-00037169) (asserting the live operator

5. The ITG conducted tracebacks on several calls in response to consumer complaints. The results of the tracebacks indicated that SK Teleco was the originating provider for the calls.²⁶ The ITG previously notified SK Teleco of those calls and provided the Company access to supporting data identifying each call.²⁷ 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.²⁸ 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.²⁹ Between March 31, 2025, and April 11, 2025, SK Teleco failed to respond to traceback requests from the ITG for each of the 16 calls listed in Attachment B of the Notice.³⁰ Neither the Bureau nor the ITG received a response for any of the 16 calls identified in Attachment B of the Notice.³¹

C. SK Teleco's Response to the Notice

6. *SK Teleco's Investigation into Illegal Robocall Traffic.* SK Teleco provided its first response on December 3, 2025,³² and its final response on December 10, 2025.³³ The Company informed the Bureau on December 3, 2025, within the 48-hour deadline, that it “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 . . . [.]”³⁴ The Company claimed it implemented “enhanced vetting and monitoring of wholesale/reseller customers” which included (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.”³⁵

claimed to work for the Social Security Administration); FCC Complaint #7241814 (Aug. 16, 2024) (on file at EB-TCD-24-00037169) (asserting the live operator claimed to work for the Federal Trade Commission)).

²⁶ See ITG July Response; see also SK Teleco Notice, Attachment A (noting the Company's role as the originating provider for each identified call).

²⁷ See ITG July Response.

²⁸ *Id.*

²⁹ See SK Teleco LLC Certification (No. RMD0014982), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Aug. 12, 2024), https://fccprod.servicenow.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=3f92798c1ba8b150680f657ae54bcb2a&view=sp (SK Teleco Listing).

³⁰ ITG April Response.

³¹ See, e.g., SK Teleco 48-hour Response; SK Teleco Final Response *supra* note 8; E-mail from {{ }}, 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).

³² SK Teleco 48-hour Response. 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).

³³ SK Teleco Final Response.

³⁴ SK Teleco 48-hour Response, *supra* note 8, at 1.

³⁵ SK Teleco Final Response, *supra* note 8, at 4.

7. The Company also claimed 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.”³⁶ 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.”³⁷ 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.”³⁸

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.”³⁹ 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.”⁴⁰

9. As to the traceback requests in Attachment B, the Company claimed, in part, that they “completed, or are in the process of completing, responses to each of the 16 calls” and that they have identified their role in the call path and identified their customer.⁴¹ 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.⁴² This information is missing from the Company’s 48-hour or final response, and the ITG portal.

D. Initial Determination Order

10. On April 20, 2026, the Bureau released the Initial Determination Order.⁴³ The Initial Determination Order directed SK Teleco to file a response within 14 days of the date of the order and stated that the response should include an explanation as to why the Bureau should not issue a Final Determination Order mandating that providers immediately downstream from SK Teleco block *all* of its traffic.⁴⁴ Additionally, the Order provided that failure to respond to the Initial Determination Order would result in the Bureau removing the Company’s certification from the RMD.⁴⁵ On April 20, 2026, the Bureau sent the Initial Determination Order to SK Teleco via certified mail, and on April 29, 2026,

³⁶ *Id.* at 1.

³⁷ *Id.* at 2.

³⁸ *Id.* at 3.

³⁹ *Id.* at 1.

⁴⁰ *Id.*

⁴¹ *Id.* at 4-5.

⁴² See ITG E-mail, *supra* note 31 (confirming that SK Teleco had not updated the tracebacks).

⁴³ Initial Determination Order.

⁴⁴ *Id.*

⁴⁵ *Id.*

the Bureau received a signed certified mail card acknowledging receipt.⁴⁶ The Bureau sent an email containing the Initial Determination Order, with the subject line “Official Correspondence from the Federal Communications Commission,” to SK Teleco’s official contact listed in the RMD.⁴⁷ Other than signing the certified mail signature card, SK Teleco has not responded to the Initial Determination Order.

III. DISCUSSION

11. The Bureau issued the SK Teleco Notice to the Company on December 2, 2025.⁴⁸ 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.⁴⁹ The Notice directed the Company that the report must include a certification that the Company is blocking the identified traffic and will continue to do so.⁵⁰ 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].”⁵¹

12. SK Teleco did not adequately respond to the Notice.⁵² The Company provided two responses, one on December 3, 2025, and the final response on December 10, 2025.⁵³ 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.”⁵⁴ 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 did not complete the traceback responses.⁵⁵ 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.”⁵⁶

13. The Bureau then directed SK Teleco to file a response to the Initial Determination Order.⁵⁷ Specifically, the Order required SK Teleco to explain why the Bureau should not issue a Final Determination Order mandating that providers immediately downstream from SK Teleco block *all* of its traffic.⁵⁸ The Order directed SK Teleco to file its response with the Bureau within 14 calendar days of the

⁴⁶ See Rachel Cox, SK Teleco LLC, PS Form 3811 (Certified Mail Return Receipt).

⁴⁷ Email from Enforcement Bureau TCD to Anupam Lal, Robocall Mitigation Contact, SK Teleco, Saurabh Rajput, Chief Executive Officer, SK Teleco (Apr. 20, 2026, 1:18 PM ET).

⁴⁸ SK Teleco Notice.

⁴⁹ *Id.* at 5.

⁵⁰ *Id.*

⁵¹ *Id.* at 7 (emphasis added).

⁵² See SK Teleco 48-hour Response, *supra* note 8; SK Teleco Final Response, *supra* note 8.

⁵³ See *Id.*

⁵⁴ See SK Teleco 48-hour Response, *supra* note 8; SK Teleco Final Response, *supra* note 8.

⁵⁵ ITG E-mail, *supra* note 31.

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

⁵⁷ Initial Determination Order, at 7, para. 12.

⁵⁸ *Id.*

date of the Initial Determination Order.⁵⁹ Furthermore, the Bureau advised the Company that failure to respond to the Initial Determination Order or submit an adequate response providing a reasonable basis for why the identified traffic is legal, or continued transmission of substantially similar traffic, would result in the Bureau issuing a Final Determination Order.⁶⁰ SK Teleco did not respond to the Initial Determination Order.

14. SK Teleco did not sufficiently respond to the Notice and did not file any response to the Initial Determination Order. The Bureau therefore finds that SK Teleco has failed to comply with its obligations under section 64.1200(n)(2) of the Commission's rules.⁶¹ This Final Determination Order serves 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 date of this Final Determination Order.⁶² Any provider that chooses to initiate blocking sooner than 30 calendar days from the release of this Final Determination Order may do so consistent with section 64.1200(k)(4) of the Commission's rules.⁶³

15. Additionally, SK Teleco's certification shall be removed from the RMD. All voice service providers and intermediate providers shall cease accepting calls directly from SK Teleco within two business days of the release date of this Removal Order.⁶⁴ SK Teleco shall not be permitted to refile unless and until both the Bureau and WCB consent.

IV. ORDERING CLAUSES

16. 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, 1.102(b)(1), and 64.1200(n)(2) of the Commission's rules, 47 CFR §§ 0.111, 0.311, 1.1, 1.102(b)(1), and 64.1200(n)(2); and the *Sixth Caller ID Authentication Order*,⁶⁵ all immediate downstream providers **MUST BLOCK AND CEASE TO ACCEPT ALL TRAFFIC** directly from SK Teleco **beginning no later than 30 calendar days** after the release date of this Final Determination Order and Removal Order.⁶⁶

17. **IT IS FURTHER ORDERED** that SK Teleco is **IMMEDIATELY REMOVED** from the Robocall Mitigation Database as of the release date of this Final Determination Order and Removal Order.

18. **IT IS FURTHER ORDERED** that within **two business days** of the release of this Final Determination Order and Removal Order all intermediate providers and voice service providers **MUST CEASE ACCEPTING TRAFFIC** directly from SK Teleco.

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ See 47 CFR § 64.1200(n)(2)(iii).

⁶² *Id.* § 64.1200(n)(3).

⁶³ *Id.*; *id.* § 64.1200(k)(4) (allowing for permissive blocking of calls from an originating or intermediate provider if certain conditions are met).

⁶⁴ See 47 CFR § 64.6305(g)(1); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 58; *Global UC Removal Order*, 37 FCC Rcd at 13379, para. 8.

⁶⁵ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604-05, paras. 60-62.

⁶⁶ 47 CFR § 64.1200(n)(3). We note that downstream providers will be required to cease accepting traffic directly from SK Teleco on a shorter timeframe pursuant to paragraphs 18 and 21 of this Final Determination Order and Removal Order.

19. **IT IS FURTHER ORDERED** that SK Teleco shall not refile in the Robocall Mitigation Database unless and until both the Wireline Competition Bureau and the Enforcement Bureau consent.

20. **IT IS FURTHER ORDERED** that pursuant to section 1.102(b) of the Commission's rules, 47 CFR § 1.102(b), this Final Determination Order and Removal Order **SHALL BE EFFECTIVE** upon release.

21. **IT IS FURTHER ORDERED** that copies of this Final Determination Order and Removal Order shall be filed in EB Docket No. 22-174 and sent by email and certified mail, return receipt requested, to: Anupam Lal, Robocall Mitigation Contact for SK Teleco LLC, noc@skteleco.net and SK Teleco LLC, Saurabh Rajput, 127 N Higgins Ave, Suite 307D Missoula, MT 59802, saurabh.rajput@skteleco.net.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre
Chief
Enforcement Bureau