

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

In the Matter of

Robocall Mitigation Database Filers

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EB-TCD-25-00038590¹

ORDER

Adopted: September 2, 2026

Released: September 2, 2026

By the 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 14 companies (each, a Company; collectively, the Companies) identified in Appendix A from the Robocall Mitigation Database (RMD). On March 24, 2026, the Bureau issued an Order directing 35 companies (including each of the Companies) to cure deficiencies in their RMD certifications and notify the Bureau upon doing so or, alternatively, to file a response explaining why the Bureau should not remove the company's certification from the RMD.² The 14 Companies failed to do either. Their RMD certifications remain deficient because, inclusive of their robocall mitigation plan, they lack required information.³ **Removal of a Company's certification from the RMD requires all intermediate providers and voice service providers⁴ to cease accepting all calls directly from the Company.**⁵ The Companies shall not re-file an RMD certification without the prior approval of the Bureau and the Commission's Wireline Competition Bureau (WCB).

II. BACKGROUND

2. "Stopping illegal robocalls is the [Commission's] top consumer protection priority."⁶ Accordingly, the Commission established the RMD in 2020 to promote transparency and effective

¹ This matter began under File No. EB-TCD-24-00036891 and was subsequently assigned File No. EB-TCD-25-00038590. Any future correspondence with the Commission concerning this matter should reflect the new file number.

² *Robocall Mitigation Database Filers*, Order, No. DA 26-282, 2026 WL 1013555, at *1, para. 1 (EB Mar. 24, 2026) (*March 2026 Show Cause Order*).

³ See generally 47 CFR § 64.6305(d)-(f) (RMD certification requirements for voice service providers, gateway providers, and non-gateway intermediate providers).

⁴ For purposes of this order, we use the term "voice service provider" consistent with the definition of "voice service" in section 64.6300 of our rules. See 47 CFR § 64.6300(o). As such, the term "voice service provider" excludes intermediate providers (*i.e.*, gateway providers and non-gateway intermediate providers), as those terms are defined in section 64.6300. See *id.* § 64.6300(d), (g), (i).

⁵ See 47 CFR § 64.6305(g). Notwithstanding this requirement, "[a] provider 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 it does not block any calls from public safety answering points and government emergency numbers." *Id.* at § 64.6305(g)(5).

⁶ *Stop Unwanted Robocalls and Texts*, Fed. Comm'n Comm'n, <https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts> (last visited June 9, 2026).

robocall mitigation.⁷ 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, including by expanding the obligation to submit a robocall mitigation plan for new and existing filers.⁸ 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 certification.⁹ 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, including the newly required or updated robocall mitigation plan by that same date.¹⁰

3. Under the amended rule, voice service providers, gateway providers, and non-gateway intermediate providers¹¹ must submit several pieces of information in their RMD certifications. *First*, a provider must certify that all calls that it originates, carries, or processes on its network are subject to a robocall mitigation program, that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the RMD, and whether it has fully, partially, or not implemented STIR/SHAKEN on the Internet Protocol portions of its network.¹² *Second*, the provider must upload a robocall mitigation plan that describes the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program based on the role(s) it serves in the call chain,¹³ including: (a) a description of the affirmative, effective measures it is taking to prevent new and renewing customers from originating illegal robocalls (if it is a voice service provider); (b) a description of any call analytics system(s) that it utilizes, including those operated by a third-party vendor; and (c) a description of the procedures it is using to know its upstream providers.¹⁴ *Third*, the provider must provide its business name, address, and other identifying information, including contact information for a person responsible for addressing robocall mitigation-

⁷ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902, para. 82 (2020) (*Second Caller ID Authentication Order*). The RMD opened for filings on April 20, 2021. *Wireline Competition Bureau Announces Opening of Robocall Mitigation Database and Provides Filing Instructions and Deadlines*, WC Docket No. 17-97, Public Notice, 36 FCC Rcd 7394 (WCB 2021).

⁸ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, 2592-601, paras. 36-52 (2023) (*Sixth Caller ID Authentication Order*).

⁹ *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*).

¹⁰ 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*); Fed. Comm'n's Comm'n, *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).

¹¹ 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.

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

¹³ See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2593, para. 39; *RMD Public Notice*, 39 FCC Rcd at 385, 388.

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

related issues, and its principals, affiliates, subsidiaries, and parent companies.¹⁵ *Fourth*, the provider must include certain other information, including: (a) the role it is playing in the call chain; (b) detailed information supporting any claimed STIR/SHAKEN implementation extension or exemption; (c) a statement whether it or any affiliated entity has been subject to a Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD certification; and (d) the provider's commitment to respond fully to traceback requests within 24 hours.¹⁶

4. The Bureau may remove a certification from the RMD that is deficient.¹⁷ 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.¹⁸ If the provider fails to cure the deficiency, the Bureau will release an order finding that a provider's certification is deficient based on the available evidence and direct the provider to, within 14 days, cure the deficiency in its certification 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.¹⁹ 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.²⁰

5. Following the February 26, 2024 effective date of the amendments to section 64.6305, WCB conducted a review of certifications in the RMD and identified providers that failed to update their RMD certifications with the required information by that date to comply with section 64.6305, as amended. WCB notified each Company on March 29, 2024, that its certification was noncompliant with section 64.6305 because the Company had failed to submit an updated RMD certification by the February 26, 2024 deadline.²¹ WCB's notification informed each Company that it "must submit an updated certification [, including an] updated robocall mitigation plan[,] in the Robocall Mitigation Database by Monday, April 29, 2024."²² After this second deadline, the Companies still had not updated their respective RMD certifications with the required information; as a result, WCB referred each Company to the Bureau to initiate removal proceedings.

6. On December 10, 2024, the Bureau released the *December 2024 Show Cause Order*, which required the 2,411 identified providers (including each of the Companies) to cure their deficient RMD certifications and notify the Bureau that the deficiencies have been cured or explain why the Bureau

¹⁵ 47 CFR § 64.6305(d)(4), (e)(4), (f)(4); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2595-96, 2597, 2599, paras. 42-43, 46, 48; *RMD Public Notice*, 39 FCC Rcd at 385-86.

¹⁶ 47 CFR §§ 64.6305(d)(2)(i), (iii), (iv), 64.6305(e)(2)(i), (iii), (iv), 64.6305(f)(2)(i), (iii), (iv); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2596-99, paras. 43-47; *RMD Public Notice*, 39 FCC Rcd at 385-86.

¹⁷ 47 CFR § 0.111(a)(28)(i); see *Second Caller ID Authentication Order*, 36 FCC Rcd at 1902-03, 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) (*Gateway Provider Order*) (gateway provider certifications); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2602-03, paras. 56-57 (non-gateway intermediate provider certifications).

¹⁸ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

¹⁹ *Id.*

²⁰ *Id.*

²¹ Email from Robocall Mitigation Database Team (Mar. 29, 2024) (on file in EB-TCD-24-00036891) (WCB Email).

²² *Id.*

should not remove the Company's certification from the RMD.²³ None of the Companies responded. On August 25, 2025, the Bureau released an Order removing a total of 1,203 certifications listed in the *December 2024 Show Cause Order* (including each of the Companies) based on their failure to cure their deficient certifications (*August 2025 RMD Order*).²⁴

7. Following the *August 2025 RMD Order*, the Commission received a large influx of requests from recently removed providers seeking reinstatement. In an effort to minimize service disruptions to consumers, the Bureau and WCB provisionally reinstated certifications for certain providers (including the Companies) to the RMD.²⁵ In order to be eligible for provisional reinstatement, a removed provider needed to have emailed the Bureau to request reinstatement and attempted to revise its certification to cure the noted deficiencies. The Bureau advised the provisionally reinstated Companies that Commission staff may notify them of outstanding RMD certification deficiencies and require additional changes to their certifications.²⁶ The Companies were made aware that certifications not brought into compliance with the Commission's rules may be subject to removal from the RMD again.²⁷ Between September 15, 2025 and January 28, 2026, the Bureau notified each Company that its RMD certification was deficient and identified the specific deficiencies with the certification (Notification Emails).²⁸ The Notification Emails instructed the Companies to address the identified deficiencies within 14 days and to respond to the Bureau's email when they completed the revisions. The Notification Emails further noted: "Filings that are not brought into compliance with the Commission's rules by the Company within 14 days may be subject to removal from the RMD again"²⁹ As of March 23, 2026, the Bureau had not received responses to the Notification Emails from any of the Companies, and each of the Companies' RMD certifications remained deficient.³⁰

8. On March 24, 2026, the Bureau released the *March 2026 Show Cause Order*, which required 35 identified providers (including each of the Companies) to cure their deficient RMD certifications and notify the Bureau that the deficiencies have been cured or explain why the Bureau should not remove the Company's certification from the RMD.³¹ None of the Companies updated their certifications in response to the *March 2026 Show Cause Order*. Several deadlines have come and gone: the Companies' RMD certifications remain deficient in the manner the Notification Emails detailed.

III. DISCUSSION

9. The Bureau finds that the Companies listed in Appendix A have deficient RMD certifications because they failed to update their certifications with the required information. Since the

²³ See *2,411 Robocall Mitigation Database Filers*, EB-TCD-24-00036891, Order, 39 FCC Rcd 13318, 13318, 13321, paras. 1, 7-8 (EB 2024) (*December 2024 Show Cause Order*).

²⁴ See *Robocall Mitigation Database Filers*, EB-TCD-25-00038590, Order, 40 FCC Rcd 6009 (EB 2025) (*August 2025 RMD Order*).

²⁵ Provisional reinstatement was a special circumstance to the facts of the RMD removal proceeding that culminated in the *August 2025 RMD Order*. RMD filers should have no expectation that provisional reinstatements will be used in the future.

²⁶ See, e.g., Email from RMD reinstatement address (RMDReinstatementRequest@fcc.gov) (Aug. 29, 2025 5:06 PM EDT) (on file in EB-TCD-25-00038590).

²⁷ See *id.*

²⁸ See *March 2026 Show Cause Order*, DA 26-282, 2026 WL 1013555, at *4-7, App. A (listing the recipients and timestamps of the Notification Emails). The Notification Emails are on file in EB-TCD-25-00038590. See, e.g., Email from RMD reinstatement address (RMDReinstatementRequest@fcc.gov) (Sept. 15, 2025 5:14 PM EDT).

²⁹ See, e.g., Email from RMD reinstatement address (RMDReinstatementRequest@fcc.gov) (Sept. 15, 2025 5:14 PM EDT).

³⁰ *March 2026 Show Cause Order*, DA 26-282, 2026 WL 1013555, at *2, para. 7.

³¹ *Id.*, at *1, para. 1.

Commission's amendments to section 64.6305 took effect on February 26, 2024, the Companies have been placed on notice no fewer than five times that their RMD certifications are deficient. These notices include: (1) the March 29, 2024 WCB notification, (2) the *December 2024 Show Cause Order*, (3) the *August 2025 RMD Order*, (4) the Notification Emails, and (5) the *March 2026 Show Cause Order*. Each Company listed in Appendix A failed to take remedial measures, and none of the Companies responded to the *March 2026 Show Cause Order*. Therefore, the Companies' RMD filings are deficient and warrant removal.

10. We remove the certifications of the Companies identified in Appendix A from the RMD as of the release date of this Order. **All intermediate providers and voice service providers must cease accepting traffic directly from the Companies within two business days of the release date of this Order.**³² The Companies shall not refile in the RMD unless and until both WCB and the Bureau consent.

IV. ORDERING CLAUSES

11. 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(e), 227b, 251(e), 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 Order is **ADOPTED**.

12. **IT IS FURTHER ORDERED** that the Companies listed 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 within two business days of the release of this order all intermediate providers and voice service providers **MUST CEASE ACCEPTING TRAFFIC DIRECTLY FROM THE COMPANIES LISTED IN APPENDIX A**.

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

15. **IT IS FURTHER ORDERED** that each Company listed in Appendix A shall not refile in the Robocall Mitigation Database unless and until both the Wireline Competition Bureau and the Enforcement Bureau consent.

16. **IT IS FURTHER ORDERED** that copies of this Order shall be sent by email and certified mail to the robocall mitigation contact (as certified in the RMD) for each Company listed in Appendix A.

FEDERAL COMMUNICATIONS COMMISSION

Hunter Deeley
Acting Chief
Enforcement Bureau

³² See 47 CFR § 64.6305(g); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 58; *Global UC Inc*, Removal Order, 37 FCC Rcd 13376, 13379, para. 8 (EB 2022).

Appendix A

RMD File No.	Business Name
RMD0005475	Skycom Healthcare
RMD0005673	Reachme.com Inc
RMD0006142	CFX BUSINESS SOLUTIONS INC
RMD0006392	Opex Communications Inc
RMD0006872	HIGHCOMM LLC
RMD0007131	Digital Division LLC
RMD0007323	CSB Technologies
RMD0007602	makrodepot
RMD0007929	Convergence Technology Solutions COrp.
RMD0007940	Apps Communications, Inc.
RMD0008129	Conference America, Inc.
RMD0008143	Dixie Net Communications
RMD0008338	SECURE
RMD0008713	Inatech Solutions Inc.