



**FEDERAL COMMUNICATIONS COMMISSION**  
445 12th Street, SW  
Washington, DC 20554

November 6, 2018

**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Jonathan Spalter  
President & CEO  
USTelecom – The Broadband Association  
601 New Jersey Avenue, NW  
Suite 600  
Washington, DC 20001

**Re: US Telecom Industry Traceback Group**

Dear Mr. Spalter,

On behalf of the Federal Communications Commission's Enforcement Bureau and the FCC's Chief Technology Officer, we write this letter to express our gratitude for the work of USTelecom and the USTelecom Industry Traceback Group in the ongoing battle against illegal robocalls and harmful spoofed calls.

Ending the twin abuses of illegal robocalls and illegal spoofed calls is the top consumer protection priority of the Federal Communications Commission. Accordingly, the Enforcement Bureau has focused on taking swift action against those who engage in these activities. We recognize that USTelecom's creation and continued operation of the USTelecom Industry Traceback Group has been instrumental in helping the Commission to achieve that goal.

Over the course of the two years that the USTelecom Industry Traceback Group has been in operation, the amount of time necessary to conduct a traceback investigation from start to finish has shrunk from months to weeks. In fact, in the most recent traceback referrals we have received from your organization, the USTelecom Industry Traceback Group has been able to provide a traceback chain reaching only one "hop" back from the originating carrier responsible for the harmful traffic—a significant improvement over the Bureau's initial traceback attempts, which might have required 10 or more individual subpoenas to complete. In addition, the information from USTelecom or its member organizations about illegal spoofing and robocall surges has resulted in dozens of active investigations. Even when those investigations have not culminated in formal enforcement actions, the information has been invaluable in helping Enforcement Bureau staff identify patterns and common sources of harmful call traffic.

As Enforcement Bureau Chief Rosemary Harold stated in her testimony before Congress this past April, if the problems of illegal robocalling and harmful spoofing were easy to fix, we would have done it a long time ago. The fact is—as you are well aware—neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. The partnership that the FCC and USTelecom have created in this space is exactly the kind of

industry/government cooperation necessary for success. We hope that as time goes on, more carriers will join this critical effort.

The Enforcement Bureau and the FCC's Chief Technology Officer look forward to building on the foundation of the past two years and achieving even greater successes in the future. We are confident that there will be many more opportunities for cooperation, and that these shared endeavors will result in meaningful enforcement outcomes that inure to the benefit of the American people.

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC

Alliance	IDT Telecom
ANI Networks	Inteliquent
AT&T	Level3
Bandwidth.com	NovaTel
Bell Canada	Peerless
CenturyLink	SilverStar
Charter Communications	Sprint
Cincinnati Bell	T-Mobile
Comcast	Verizon
Consolidated Communications	West Telecom
Cox Communications	Windstream
Frontier	YMax
Google	



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Daniel Koch  
CEO  
382 Communications Corporation  
45 Dan Road  
Suite 130  
Canton, MA 02021

**Re: Official Correspondence from the Federal Communications Commission**

Dear Daniel Koch,

We are writing to urge 382 Communications to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. We write this letter to urge 382 Communications to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls.

USTelecom is a trade association representing members of the broadband industry. Approximately two years ago, USTelecom formed the USTelecom Industry Traceback Group to facilitate information flow among carriers and providers to "traceback" the traffic of illegal calls to the originating carrier. Provider participation in this call traceback effort has proved useful in the Commission's enforcement efforts to combat illegal robocalling and spoofing. 382 Communications' full cooperation with the USTelecom Industry Traceback Group's requests for call information is critical in the efforts to find the perpetrators of illegal call traffic and scammers that use the phone system to prey upon unsuspecting consumers.

Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. When the Industry Traceback Group identifies surges in suspect call traffic and attempts to identify the source, it needs your help as a provider in the call traffic chain to ferret out the perpetrators of unlawful call traffic.

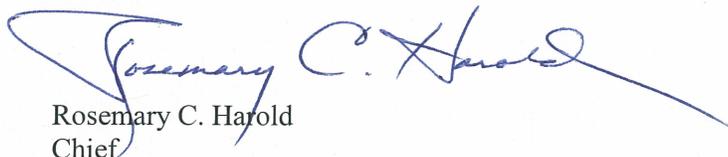
The Enforcement Bureau and the FCC's Chief Technology Officer look forward to your future cooperation with public and private efforts in combating consumer scams that are facilitated by illegal robocalling and spoofing. In addition to your cooperation with these efforts, we ask you to answer the following questions.

1. What safeguards does 382 Communications take to identify the source of illegal traffic?

2. What safeguards does 382 Communications take to stem the flow of unlawful calls to your customers and to other carriers and voice providers?

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Jon Kaen  
CEO  
Global Voicecom, Inc.  
15 Cuttermill Rd.  
Suite 251  
Great Neck, NY 11021

**Re: Official Correspondence from the Federal Communications Commission**

Dear Jon Kaen,

We are writing to urge Global Voicecom to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. We write this letter to urge Global Voicecom to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls.

USTelecom is a trade association representing members of the broadband industry. Approximately two years ago, USTelecom formed the USTelecom Industry Traceback Group to facilitate information flow among carriers and providers to "traceback" the traffic of illegal calls to the originating carrier. Provider participation in this call traceback effort has proved useful in the Commission's enforcement efforts to combat illegal robocalling and spoofing. Global Voicecom's full cooperation with the USTelecom Industry Traceback Group's requests for call information is critical in the efforts to find the perpetrators of illegal call traffic and scammers that use the phone system to prey upon unsuspecting consumers.

Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. When the Industry Traceback Group identifies surges in suspect call traffic and attempts to identify the source, it needs your help as a provider in the call traffic chain to ferret out the perpetrators of unlawful call traffic.

The Enforcement Bureau and the FCC's Chief Technology Officer look forward to your future cooperation with public and private efforts in combating consumer scams that are facilitated by illegal robocalling and spoofing. In addition to your cooperation with these efforts, we ask you to answer the following questions.

1. What safeguards does Global Voicecom take to identify the source of illegal traffic?

2. What safeguards does Global Voicecom take to stem the flow of unlawful calls to your customers and to other carriers and voice providers?

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Noah Kamrat  
CEO  
IP Link Telecom, Inc.  
2852 Willamette Street  
Suite 213  
Eugene, OR 97405

**Re: Official Correspondence from the Federal Communications Commission**

Dear Noah Kamrat,

We are writing to strongly urge IP Link Telecom to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. Equally important is industry diligence in helping detect and stop the flow of illegal traffic. We write this letter to first encourage IP Link Telecom to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls. We also encourage IP Link Telecom to take measures to prevent the flow of illegal traffic.

USTelecom is a trade association representing members of the broadband industry. Approximately two years ago, USTelecom formed the USTelecom Industry Traceback Group to facilitate information flow among carriers and providers to "traceback" the traffic of illegal calls to the originating carrier. Provider participation in this call traceback effort has proved useful in the Commission's enforcement efforts to combat illegal robocalling and spoofing. Unfortunately, we understand that IP Link Telecom is not currently cooperating fully with the USTelecom Industry Traceback Group's requests for call information in order to find the perpetrators of illegal call traffic and scammers that use the phone system to prey upon unsuspecting consumers. We strongly urge IP Link Telecom to do so. When it identifies surges in suspect and potentially unlawful call traffic, the Industry Traceback Group cannot ferret out the perpetrators and attempt to identify the source without your help.

In addition, the Commission has taken several steps to ensure that consumers are not burdened with calls they do not want, while also ensuring that they receive the calls they do want. For example, in November 2017, the Commission made clear that providers may block calls coming from phone numbers that are invalid, unallocated, or unassigned.

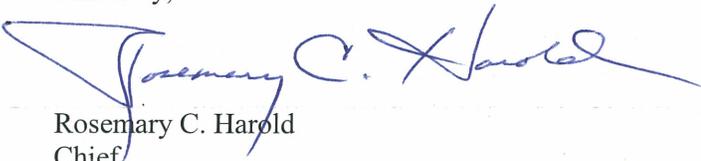
We would like information about the procedures that IP Link Telecom has in place to detect and block the spoofed calls that the Commission has previously identified as highly likely to be illegal. In this regard, pursuant to our authority under Section 403 of the Communications Act (47 U.S.C. § 403), please provide responses to the following questions.

1. What technical and procedural processes does IP Link Telecom have in place to detect or identify suspicious call traffic (e.g., detecting unusual call patterns or large call volumes, calls coming from numbers that customers have complained about)?
2. What steps do you take to verify that traffic coming to you directly or indirectly through an international gateway is not unlawfully spoofed?
3. Similarly, what steps do you take to verify that traffic coming to you from outside the domestic public switched telephone network, such as over an Internet Protocol gateway, and particularly international traffic, is not unlawfully spoofed?
4. Does IP Link Telecom block calls that are on the Do Not Originate list, or block calls that spoof an invalid or unassigned number? What other safeguards does IP Link Telecom have in place to identify and investigate other suspicious call traffic?
5. Has IP Link Telecom blocked any call traffic from a number on the Do Not Originate list, or from an invalid or unassigned number in the past 24 months? If so, please provide a detailed description of the circumstances surrounding such action (omitting any information that might identify a particular customer), how you identified such traffic, and any reporting of the potential illegal traffic.
6. Provide representative samples of IP Link Telecom's marketing materials that it uses to market its services to potential wholesale or retail customers, including electronic snapshots of web-based marketing, audio and video marketing materials, and any written marketing materials, and sample contracts.

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. We encourage and expect your future cooperation in combating consumer scams that are facilitated by illegal robocalling and spoofing. We will continue to monitor IP Link Telecom's cooperation with public and private efforts to (1) identify the source of illegal traffic and (2) take lawful actions to stem the flow of unwanted or unlawful calls.

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Ryan Brosnahan  
CEO  
R Squared Telecom, LLC  
526 S Main St.  
Suite 802  
Akron, OH 44311

**Re: Official Correspondence from the Federal Communications Commission**

Dear Ryan Brosnahan,

We are writing to strongly urge R Squared Telecom to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. Equally important is industry diligence in helping detect and stop the flow of illegal traffic. We write this letter to first encourage R Squared Telecom to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls. We also encourage R Squared Telecom to take measures to prevent the flow of illegal traffic.

USTelecom is a trade association representing members of the broadband industry. Approximately two years ago, USTelecom formed the USTelecom Industry Traceback Group to facilitate information flow among carriers and providers to "traceback" the traffic of illegal calls to the originating carrier. Provider participation in this call traceback effort has proved useful in the Commission's enforcement efforts to combat illegal robocalling and spoofing. Unfortunately, we understand that R Squared Telecom is not currently cooperating fully with the USTelecom Industry Traceback Group's requests for call information in order to find the perpetrators of illegal call traffic and scammers that use the phone system to prey upon unsuspecting consumers. We strongly urge R Squared Telecom to do so. When it identifies surges in suspect and potentially unlawful call traffic, the Industry Traceback Group cannot ferret out the perpetrators and attempt to identify the source without your help.

In addition, the Commission has taken several steps to ensure that consumers are not burdened with calls they do not want, while also ensuring that they receive the calls they do want. For example, in November 2017, the Commission made clear that providers may block calls coming from phone numbers that are invalid, unallocated, or unassigned.

We would like information about the procedures that R Squared Telecom has in place to detect and block the spoofed calls that the Commission has previously identified as highly likely to be illegal. In this regard, pursuant to our authority under Section 403 of the Communications Act (47 U.S.C. § 403), please provide responses to the following questions.

1. What technical and procedural processes does R Squared Telecom have in place to detect or identify suspicious call traffic (e.g., detecting unusual call patterns or large call volumes, calls coming from numbers that customers have complained about)?
2. What steps do you take to verify that traffic coming to you directly or indirectly through an international gateway is not unlawfully spoofed?
3. Similarly, what steps do you take to verify that traffic coming to you from outside the domestic public switched telephone network, such as over an Internet Protocol gateway, and particularly international traffic, is not unlawfully spoofed?
4. Does R Squared Telecom block calls that are on the Do Not Originate list, or block calls that spoof an invalid or unassigned number? What other safeguards does R Squared Telecom have in place to identify and investigate other suspicious call traffic?
5. Has R Squared Telecom blocked any call traffic from a number on the Do Not Originate list, or from an invalid or unassigned number in the past 24 months? If so, please provide a detailed description of the circumstances surrounding such action (omitting any information that might identify a particular customer), how you identified such traffic, and any reporting of the potential illegal traffic.
6. Provide representative samples of R Squared Telecom's marketing materials that it uses to market its services to potential wholesale or retail customers, including electronic snapshots of web-based marketing, audio and video marketing materials, and any written marketing materials, and sample contracts.

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. We encourage and expect your future cooperation in combating consumer scams that are facilitated by illegal robocalling and spoofing. We will continue to monitor R Squared Telecom's cooperation with public and private efforts to (1) identify the source of illegal traffic and (2) take lawful actions to stem the flow of unwanted or unlawful calls.

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Andre DeMattia  
CEO  
Sonic Systems dba. Talkie Communications, Inc.  
141 Grays Pond Ln.  
Centreville, MD 21617

**Re: Official Correspondence from the Federal Communications Commission**

Dear Andre DeMattia,

We are writing to strongly urge Sonic Systems to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. Equally important is industry diligence in helping detect and stop the flow of illegal traffic. We write this letter to first encourage Sonic Systems to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls. We also encourage Sonic Systems to take measures to prevent the flow of illegal traffic.

USTelecom is a trade association representing members of the broadband industry. Approximately two years ago, USTelecom formed the USTelecom Industry Traceback Group to facilitate information flow among carriers and providers to "traceback" the traffic of illegal calls to the originating carrier. Provider participation in this call traceback effort has proved useful in the Commission's enforcement efforts to combat illegal robocalling and spoofing. Unfortunately, we understand that Sonic Systems is not currently cooperating fully with the USTelecom Industry Traceback Group's requests for call information in order to find the perpetrators of illegal call traffic and scammers that use the phone system to prey upon unsuspecting consumers. We strongly urge Sonic Systems to do so. When it identifies surges in suspect and potentially unlawful call traffic, the Industry Traceback Group cannot ferret out the perpetrators and attempt to identify the source without your help.

In addition, the Commission has taken several steps to ensure that consumers are not burdened with calls they do not want, while also ensuring that they receive the calls they do want. For example, in November 2017, the Commission made clear that providers may block calls coming from phone numbers that are invalid, unallocated, or unassigned.

We would like information about the procedures that Sonic Systems has in place to detect and block the spoofed calls that the Commission has previously identified as highly likely to be illegal. In this regard, pursuant to our authority under Section 403 of the Communications Act (47 U.S.C. § 403), please provide responses to the following questions.

1. What technical and procedural processes does Sonic Systems have in place to detect or identify suspicious call traffic (e.g., detecting unusual call patterns or large call volumes, calls coming from numbers that customers have complained about)?
2. What steps do you take to verify that traffic coming to you directly or indirectly through an international gateway is not unlawfully spoofed?
3. Similarly, what steps do you take to verify that traffic coming to you from outside the domestic public switched telephone network, such as over an Internet Protocol gateway, and particularly international traffic, is not unlawfully spoofed?
4. Does Sonic Systems block calls that are on the Do Not Originate list, or block calls that spoof an invalid or unassigned number? What other safeguards does Sonic Systems have in place to identify and investigate other suspicious call traffic?
5. Has Sonic Systems blocked any call traffic from a number on the Do Not Originate list, or from an invalid or unassigned number in the past 24 months? If so, please provide a detailed description of the circumstances surrounding such action (omitting any information that might identify a particular customer), how you identified such traffic, and any reporting of the potential illegal traffic.
6. Provide representative samples of Sonic Systems' marketing materials that it uses to market its services to potential wholesale or retail customers, including electronic snapshots of web-based marketing, audio and video marketing materials, and any written marketing materials, and sample contracts.

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. We encourage and expect your future cooperation in combating consumer scams that are facilitated by illegal robocalling and spoofing. We will continue to monitor Sonic Systems' cooperation with public and private efforts to (1) identify the source of illegal traffic and (2) take lawful actions to stem the flow of unwanted or unlawful calls.

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Aaron Leon  
CEO  
Thinq, Inc.  
5420 Wade Park Blvd.  
Suite 100  
Raleigh, NC 27607

**Re: Official Correspondence from the Federal Communications Commission**

Dear Aaron Leon,

We are writing to urge Thinq to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. We write this letter to urge Thinq to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls.

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Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. When the Industry Traceback Group identifies surges in suspect call traffic and attempts to identify the source, it needs your help as a provider in the call traffic chain to ferret out the perpetrators of unlawful call traffic.

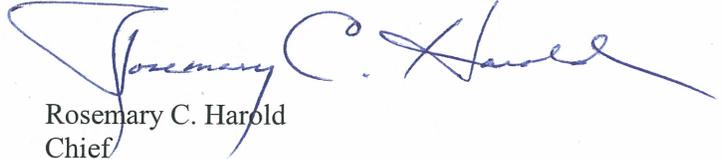
The Enforcement Bureau and the FCC's Chief Technology Officer look forward to your future cooperation with public and private efforts in combating consumer scams that are facilitated by illegal robocalling and spoofing. In addition to your cooperation with these efforts, we ask you to answer the following questions.

1. What safeguards does Thinq take to identify the source of illegal traffic?

2. What safeguards does Thing take to stem the flow of unlawful calls to your customers and to other carriers and voice providers?

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Giuseppe Bio  
CEO  
TouchTone Communications, Inc.  
16 South Jefferson Road  
Whippany, NJ 07981

**Re: Official Correspondence from the Federal Communications Commission**

Dear Giuseppe Bio,

We are writing to urge TouchTone Communications to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. We write this letter to urge TouchTone Communications to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls.

USTelecom is a trade association representing members of the broadband industry. Approximately two years ago, USTelecom formed the USTelecom Industry Traceback Group to facilitate information flow among carriers and providers to "traceback" the traffic of illegal calls to the originating carrier. Provider participation in this call traceback effort has proved useful in the Commission's enforcement efforts to combat illegal robocalling and spoofing. Touchtone Communications' full cooperation with the USTelecom Industry Traceback Group's requests for call information is critical in the efforts to find the perpetrators of illegal call traffic and scammers that use the phone system to prey upon unsuspecting consumers.

Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. When the Industry Traceback Group identifies surges in suspect call traffic and attempts to identify the source, it needs your help as a provider in the call traffic chain to ferret out the perpetrators of unlawful call traffic.

The Enforcement Bureau and the FCC's Chief Technology Officer look forward to your future cooperation with public and private efforts in combating consumer scams that are facilitated by illegal robocalling and spoofing. In addition to your cooperation with these efforts, we ask you to answer the following questions.

1. What safeguards does TouchTone Communications take to identify the source of illegal traffic?

2. What safeguards does Touchtone Communications take to stem the flow of unlawful calls to your customers and to other carriers and voice providers?

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC



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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Patricia Mathis  
CEO  
XCast Labs, Inc.  
1880 Century Park E.  
Suite 1415  
Los Angeles, CA 90067

**Re: Official Correspondence from the Federal Communications Commission**

Dear Patricia Mathis,

We are writing to strongly urge XCast Labs to cooperate with efforts to combat illegal robocalling and unlawful Caller ID spoofing. Combatting these harmful and abusive activities is the Federal Communications Commission's top consumer protection priority. A critical component of effective enforcement against robocalling and spoofing abuses is to quickly identify the source of the traffic by tracing back the calls to their origination. Equally important is industry diligence in helping detect and stop the flow of illegal traffic. We write this letter to first encourage XCast Labs to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls. We also encourage XCast Labs to take measures to prevent the flow of illegal traffic.

USTelecom is a trade association representing members of the broadband industry. Approximately two years ago, USTelecom formed the USTelecom Industry Traceback Group to facilitate information flow among carriers and providers to "traceback" the traffic of illegal calls to the originating carrier. Provider participation in this call traceback effort has proved useful in the Commission's enforcement efforts to combat illegal robocalling and spoofing. Unfortunately, we understand that XCast Labs is not currently cooperating fully with the USTelecom Industry Traceback Group's requests for call information in order to find the perpetrators of illegal call traffic and scammers that use the phone system to prey upon unsuspecting consumers. We strongly urge XCast Labs to do so. When it identifies surges in suspect and potentially unlawful call traffic, the Industry Traceback Group cannot ferret out the perpetrators and attempt to identify the source without your help.

In addition, the Commission has taken several steps to ensure that consumers are not burdened with calls they do not want, while also ensuring that they receive the calls they do want. For example, in November 2017, the Commission made clear that providers may block calls coming from phone numbers that are invalid, unallocated, or unassigned.

We would like information about the procedures that XCast Labs has in place to detect and block the spoofed calls that the Commission has previously identified as highly likely to be illegal. In this regard, pursuant to our authority under Section 403 of the Communications Act (47 U.S.C. § 403), please provide responses to the following questions.

1. What technical and procedural processes does XCast Labs have in place to detect or identify suspicious call traffic (e.g., detecting unusual call patterns or large call volumes, calls coming from numbers that customers have complained about)?
2. What steps do you take to verify that traffic coming to you directly or indirectly through an international gateway is not unlawfully spoofed?
3. Similarly, what steps do you take to verify that traffic coming to you from outside the domestic public switched telephone network, such as over an Internet Protocol gateway, and particularly international traffic, is not unlawfully spoofed?
4. Does XCast Labs block calls that are on the Do Not Originate list, or block calls that spoof an invalid or unassigned number? What other safeguards does XCast Labs have in place to identify and investigate other suspicious call traffic?
5. Has XCast Labs blocked any call traffic from a number on the Do Not Originate list, or from an invalid or unassigned number in the past 24 months? If so, please provide a detailed description of the circumstances surrounding such action (omitting any information that might identify a particular customer), how you identified such traffic, and any reporting of the potential illegal traffic.
6. Provide representative samples of XCast Labs' marketing materials that it uses to market its services to potential wholesale or retail customers, including electronic snapshots of web-based marketing, audio and video marketing materials, and any written marketing materials, and sample contracts.

We request your detailed response by November 20, 2018. That response should be sent electronically to Parul P. Desai at [Parul.Desai@fcc.gov](mailto:Parul.Desai@fcc.gov).

Neither government nor industry, without the active assistance of the other, can hope to stem the flood of scam calls plaguing consumers across the country. We encourage and expect your future cooperation in combating consumer scams that are facilitated by illegal robocalling and spoofing. We will continue to monitor XCast Labs' cooperation with public and private efforts to (1) identify the source of illegal traffic and (2) take lawful actions to stem the flow of unwanted or unlawful calls.

Sincerely,



Rosemary C. Harold  
Chief  
Enforcement Bureau



Eric Burger  
Chief Technology Officer

cc: Ajit Pai, Chairman, FCC  
Michael O'Rielly, Commissioner, FCC  
Brendan Carr, Commissioner, FCC  
Jessica Rosenworcel, Commissioner, FCC