



United States of America
Federal Communications Commission

445 12th Street, SW
Washington, DC 20554

February 4, 2020

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Karl Douthit
Chief Executive Officer
Piratel, LLC
10572 Calle Lee, Suite 123
Los Alamitos, CA 90720

Re: Official Correspondence from the Federal Communications Commission

Dear Mr. Douthit,

We are writing to encourage Piratel to assist the Federal Communications Commission in stopping the flow of malicious robocalls originating from sources outside the United States. Combatting harmful and abusive robocallers is the Commission's top consumer protection priority. Unfortunately, many of the worst offenders originate overseas. Using "spoofed" and falsified numbers, foreign robocallers often pose as American companies, and even the U.S. government, in order to deceive and defraud American consumers.

Over the last year, one of the most prominent phone scams has involved individuals impersonating agents from the Social Security Administration to trick people into divulging personal information or transferring money.¹ In addition to falsely claiming to be government representatives, these callers often use spoofing technology to make the caller ID look like a government number. This scam cost consumers more than \$19 million in the last year.² There is good reason to believe that most of these "Social Security" calls came from foreign call centers.³

Tracebacks by the USTelecom Industry Traceback Group and the Commission have found that Piratel is being used as a gateway into the United States for many apparently illegal robocalls that originate overseas. As the point of entry for this traffic into the U.S. telephone network, Piratel is uniquely situated to assist government and industry efforts to combat apparently illegal robocalls.

¹ Office of the Inspector General, Social Security Administration, Fraud Advisory: IG Warns Public About Caller ID "Spoofing" of Social Security Fraud Hotline Phone Number (2019), <https://oig.ssa.gov/newsroom/news-releases/april-1-advisory>.

² Federal Trade Commission, Growing Wave of Social Security Imposters Overtakes IRS Scam (2019), <https://www.ftc.gov/news-events/blogs/data-spotlight/2019/04/growing-wave-social-security-imposters-overtakes-irs-scam>.

³ Herb Weisbaum, *Get a Call from the Social Security Administration? It's the Latest Government Imposter Scam* (July 13, 2019), <https://www.nbcnews.com/better/lifestyle/get-call-social-security-administration-it-s-latest-government-imposter-ncna1029031>; Madeline Purdue, *This Is Where Robocalls Are Coming From (and Where They Are Targeting)* (July 9, 2019), <https://www.usatoday.com/story/tech/2019/07/09/where-robocalls-come-from-and-where-they-target/1660503001/>.

Congress recently addressed the importance of industry efforts to trace back such calls to their origin in the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement Deterrence Act (TRACED Act) by directing the Commission to register a consortium to conduct private-led efforts to trace back suspected unlawful robocalls. Congress also encouraged the Commission to take appropriate enforcement actions for voice service providers that do not participate in private-led efforts to trace back the origin of suspected unlawful robocalls or that originate or terminate substantial amounts of unlawful robocalls. We encourage Piratel to take measures to prevent the flow of apparently illegal traffic originating outside the United States.

In furtherance of this objective, the Commission requests information about business practices regarding the foreign traffic that your company carries. Pursuant to our authority under Sections 227 and 403 of the Communications Act (47 U.S.C. §§ 227, 403), we request that you provide responses to the following questions:⁴

1. What technical and procedural processes does Piratel have in place to detect or identify call traffic that is likely to be illegal, particularly for calls with foreign origination (e.g., detecting unusual call patterns or large call volumes)?
2. What procedures does Piratel employ to ensure that the Caller ID information associated with foreign call traffic has not been unlawfully spoofed?
3. What percentage of your company's traffic comes from foreign sources?
4. What percentage of your clients are located in a country other than the United States?
5. Does Piratel advertise its services in foreign countries?
6. Have you taken any actions in the last six months to either terminate or restrict foreign traffic that you suspected to be illegal?

We request your detailed response by February 17, 2020. That response should be sent electronically to Shana Yates at shana.yates@fcc.gov.

If we hope to stop the spread of robocalls, providers and government agencies must work together. We encourage Piratel to remain vigilant, and we will continue to monitor your cooperation with public and private efforts to identify the actors behind foreign robocalls and take lawful actions to thwart unwanted and unlawful traffic.

Sincerely,



Rosemary C. Harold
Chief
Enforcement Bureau

⁴ We are issuing this letter as a courtesy, without prejudice to our position that this information can be requested, and must be produced, pursuant to our investigative authority under sections 4(i), 4(j), 227, and 403 of the Act, 47 U.S.C. §§ 154(i), 154(j), 227, 403. If you make any request for confidentiality of certain information or documents, you must strictly comply with the requirements of 47 CFR § 0.459, including a statement of the reasons for withholding the materials from inspection.