

**STATEMENT OF COMMISSIONER
GEOFFREY STARKS**

Re: *Affordable Enterprises of Arizona, LLC., Forfeiture Order*, File No. EB-TCD-17-00024974

The telemarketing scheme carried out by Affordable Enterprises of Arizona, LLC (Affordable) was large scale and deliberate in its intent to place calls displaying misleading and inaccurate caller ID information. Affordable clearly intended to obscure its identity, evade detection, and prevent consumers from opting out of future calls. Its claim of not knowing the numbers associated with prepaid phones it had purchased were no longer assigned to Affordable is unconvincing, and in any event would not excuse its failure to adhere to minimal standards for telemarketers, including requirements to transmit accurate caller ID information, to ensure that called parties could call the displayed number to request placement on a company-specific do not call list, and to refrain from calling numbers listed on the National Do Not Call Registry. Affordable also caused predictable and significant harm to subscribers whose numbers it spoofed, forcing them to endure angry calls and harassment as a result of Affordable's illegal behavior. I therefore approve this action in support of our continuing efforts to stop illegal robocalls, the Commission's top consumer protection priority.

I remain concerned, however, about our track record of actually collecting these large forfeitures we assess. I note that we should be working with the Department of Justice to establish concrete timelines and procedures for timely collection of forfeitures if these actions are going to be worth the paper they're written on.