



Federal Communications Commission  
Enforcement Bureau  
45 L Street, NE  
Washington, DC 20554

March 17, 2021

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**To:** Josh Justice  
CEO  
Stratics Networks  
762 Upper James St  
Suite 287  
Hamilton, ON L9C 3A2 Canada

**cc:** [andrew.iler@straticsnetworks.com](mailto:andrew.iler@straticsnetworks.com)

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

Dear Mr. Justice,

We have determined that Stratics Networks (Stratics) is apparently transmitting illegal robocall traffic on behalf of one or more of its clients. **You should investigate and, if necessary, cease transmitting such traffic immediately and take steps to prevent your network from continuing to be a source of apparent illegal robocalls. As noted below, downstream voice service providers will be authorized to block all of Stratics' traffic if you do not take steps to "effectively mitigate illegal traffic within 48 hours," or if you fail to inform the Commission and the Traceback Consortium within fourteen (14) days of this letter (March 31, 2021) of the steps you have taken to "implement effective measures" to prevent customers from using your network to make illegal calls.**<sup>1</sup>

**Why You Are Receiving This Notification.** You are receiving this letter because one or more investigations conducted by the Commission, in conjunction with the Traceback Consortium, revealed that Stratics apparently transmitted multiple illegal robocall campaigns from the sources listed in Attachment A.

**Actions You Should Take Now.** Stratics should take the following steps to resolve this matter:

1. Promptly investigate the transmissions identified above.
2. If necessary, "effectively mitigate" the identified unlawful traffic by determining the source of the traffic and preventing that source from continuing to originate such traffic.
3. Implement effective safeguards to prevent customers from using your network as a platform to originate illegal calls.
4. Within 48 hours, inform the Commission and the Traceback Consortium of steps taken to mitigate the identified apparent illegal traffic.
5. Within fourteen (14) days of the date of this letter (March 31, 2021), inform the Commission and the Traceback Consortium of the steps Stratics is taking to prevent

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<sup>1</sup> See 47 CFR § 64.1200(k)(4).

customers from using its network to transmit illegal robocalls.<sup>2</sup> Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.<sup>3</sup>

**Consequences for Failure to Comply.** If after 48 hours of issuance of this letter Stratics continues to route or transmit harmful robocall traffic from the entities involved in these campaigns, downstream U.S.-based voice service providers may begin blocking all calls from Stratics after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination.<sup>4</sup> Furthermore, if Stratics fails to take sufficient mitigating actions to prevent its network from continuing to be used to transmit illegal robocalls, then downstream U.S.-based providers may block calls following notice to the Commission. **Failure to act within the deadline may result in the Commission issuing a notice to all U.S.-based voice service providers that they may block ALL call traffic transmitting from your network, permanently.**

Please direct any inquiries regarding this letter to Daniel Stepanicich, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at daniel.stepanicich@fcc.gov or (202) 418-7451; and cc: to Kristi Thompson, Division Chief, Telecommunications Consumers Division,

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<sup>2</sup> See *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking, 35 FCC Rcd 7614, 7630, para. 43 (2020) (*Call Blocking Safe Harbor Report and Order*)

<sup>3</sup> You are encouraged to reach out to the Commission before the deadline if you anticipate needing more time to execute this step.

<sup>4</sup> In July 2020, the Commission adopted the *Call Blocking Safe Harbor Report and Order*, which authorized voice service providers to block illegal robocalls. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7628, para. 36; see also 47 CFR § 64.1200(k)(3)-(4). If the Commission identifies illegal traffic, based on information obtained through traceback such as that provided by the Traceback Consortium, the Commission may notify the voice service provider that it is transmitting identified probable illegal calls (or “bad traffic”) and, upon receipt of notification, the voice service provider should investigate promptly and take any steps that may be necessary to prevent the illegal caller from continuing to use the network to make such calls. Furthermore, if the notified voice service provider fails to take effective mitigation measures within 48 hours, any downstream voice service provider may block the calls from the notified provider. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7628-29, para. 39. Any voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. *Id.* at 7630, para. 42; 47 CFR § 64.1200(k)(4). If the notified voice service provider fails to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls, other downstream voice service providers may block the calls from the notified provider. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7630 para. 43; 47 CFR § 64.1200(k)(3)-(4). A voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. *Id.* at 7630, para. 43; 47 CFR § 64.1200(k)(4).

Enforcement Bureau, FCC, at kristi.thompson@fcc.gov. A copy of this letter has been sent to the Traceback Consortium.

Sincerely,

A handwritten signature in black ink, appearing to read "K. THOMPSON", written over a horizontal line.

Kristi Thompson  
Division Chief  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission

**ATTACHMENT A**

<b>Customer</b>	<b>Date of Call</b>	<b>Caller ID</b>	<b>Called Number</b>	<b>Description</b>	<b>Violation</b>
PubClub	February 8, 2021			Fraudulent Student Loan Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
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PubClub	February 8, 2021			Fraudulent Student Loan Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Omar Talamantes Inc.	January 28, 2021			Fraudulent Student Loan Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Greenvoice Telecom	November 4, 2020			Fraudulent Utility Services Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Greenvoice Telecom	October 9, 2020			Fraudulent Utility Services Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Care Advocacy Solutions	September 28, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Emarket	September 28, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Emarket	September 28, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Expert Vendor	September 24, 2020			2020 Election Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Patriots for American Leadership	September 24, 2020			2020 Election Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Patriots for American Leadership	September 24, 2020			2020 Election Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200

Nitzke Enterprize	September 23, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Nitzke Enterprise	September 23, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Nitzke Enterprise	September 23, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Progressive Promoting	September 14, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Progressive Promoting	September 14, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Progressive Promoting	September 11, 2020			Fraudulent Sweepstakes Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Shamoon Ahmad	September 4, 2020			Fraudulent DirectTV Discount Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Technest Limited	September 3, 2020			Fraudulent DirectTV Discount Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Technest Limited	September 3, 2020			Fraudulent DirectTV Discount Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Technest Limited	September 3, 2020			Fraudulent DirectTV Discount Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	September 1, 2020			Fraudulent Social Security Administration Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	August 21, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	August 17, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200

No Response	August 17, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	August 10, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	July 23, 2020			Fraudulent Credit Card Customer Support Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Netlatitude Inc.	July 2, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Third Base International Telecom, LLC	June 26, 2020			Fraudulent Social Security Administration Enforcement Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	June 12, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	June 8, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	June 8, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	June 2, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	June 2, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	June 1, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	May 26, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	May 26, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200

No Response	May 18, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	May 13, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	May 7, 2020			Fraudulent Social Security Administration Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Customer Information	April 29, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Customer Information	April 28, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Record of Traffic	April 28, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Record of Traffic	April 28, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Netlatitude Inc.	April 24, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
RSCom / NGP Telecom	April 20, 2020			Fraudulent Social Security Administration Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
National Home Buyers	April 13, 2020			RealEstate-CoronaStillBuying	47 U.S.C. § 227(b); 47 CFR § 64.1200
Netlatitude Inc.	April 13, 2020			DebtReduction-CoronaHardship	47 U.S.C. § 227(b); 47 CFR § 64.1200
National Home Buyers	April 13, 2020			RealEstate / Buy During COVID-19 Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Record of Traffic	April 12, 2020			RealEstate / Buy During COVID-19 Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200

National Home Buyers	April 11, 2020			RealEstate / Buy During COVID-19 Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Health Innovations	April 10, 2020			Health Insurance / COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Health Innovations	April 10, 2020			Health Insurance / COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Records of Traffic	April 10, 2020			Health Insurance / COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Netlatitude Inc.	April 9, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Netlatitude Inc.	April 9, 2020			COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Lead Gen Marketing Inc.	April 2, 2020			Health Insurance / COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Lead Gen Marketing Inc.	April 2, 2020			Health Insurance / COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Lead Gen Marketing Inc.	April 2, 2020			Health Insurance / COVID-19 Related Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
Telesero / Fiducia	February 4, 2020			Fraudulent Medicare Benefits Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	January 31, 2020			Fraudulent Social Security Administration Robocall	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	August 13, 2019			Robocall Campaign Targeting Arizona	47 U.S.C. § 227(b); 47 CFR § 64.1200

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No Response	August 13, 2019			Robocall Campaign Targeting Arizona	47 U.S.C. § 227(b); 47 CFR § 64.1200
No Response	July 30, 2019			Fraudulent Student Loan Advisor	47 U.S.C. § 227(b); 47 CFR § 64.1200