



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

March 17, 2021

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Kyle Wood
CEO
Yodel Technologies, LLC
2250 N Coral Canyon Blvd
Suite 202
Washington, UT 84780

cc: eric@yodelvoice.com

Re: Official Correspondence from the Federal Communications Commission

Dear Mr. Wood,

We have determined that Yodel Technologies, LLC (Yodel Technologies) 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 Yodel Technologies' 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.**¹

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 Yodel Technologies apparently transmitted multiple illegal robocall campaigns from the sources listed in Attachment A.

Actions You Should Take Now. Yodel Technologies 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.

¹ See 47 CFR § 64.1200(k)(4).

5. Within fourteen (14) days of the date of this letter (March 31, 2021), inform the Commission and the Traceback Consortium of the steps Yodel Technologies is taking to prevent customers from using its network to transmit illegal robocalls.² Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.³

Consequences for Failure to Comply. If after 48 hours of issuance of this letter Yodel Technologies 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 Yodel Technologies after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination.⁴ Furthermore, if Yodel Technologies 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,

² 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*).

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

⁴ 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 solid horizontal line.

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

ATTACHMENT A

Customer	Date of Call	Caller ID	Called Number	Description	Violation
Disability Advisor	February 23, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	February 9, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	February 9, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	February 2, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	February 2, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	February 2, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Benefit Advisors	January 28, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	January 28, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	January 28, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200

Declined to Provide Customer	January 28, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	January 28, 2021			Fraudulent Health Insurance Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	September 18, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	September 18, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	September 8, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	September 8, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	August 28, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	August 18, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	August 11, 2020			Unidentified-ConsumerCouncil	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	July 23, 2020			Unidentified-ConsumerCouncil	47 U.S.C. § 227(b); 47 CFR § 64.1200

Declined to Provide Customer	July 23, 2020			Unidentified-ConsumerCouncil	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	July 10, 2020			Autowarranty Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	June 29, 2020			Autowarranty Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	June 29, 2020			Autowarranty Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	June 29, 2020			Autowarranty Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	June 4, 2020			Mortgage-PlacementTeam	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	June 4, 2020			Mortgage-PlacementTeam	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	May 8, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	May 8, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	May 7, 2020			Employment-EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200

Declined to Provide Customer	May 7, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	May 1, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	May 1, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 24, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 24, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 24, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 20, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 20, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 20, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 20, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200

Declined to Provide Customer	April 20, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 16, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 16, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 16, 2020			Employment- EmploymentDepartment	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 16, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 16, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 16, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 16, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 3, 2020			Medical- CoronaAdministrator	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 3, 2020			COVID19 Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200

Declined to Provide Customer	April 3, 2020			COVID19 Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	April 2, 2020			COVID19 Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200
Declined to Provide Customer	February 17, 2020			SSA Impost Scam Robocalls	47 U.S.C. § 227(b); 47 CFR § 64.1200