



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

March 22, 2022

VIA ELECTRONIC DELIVERY AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Mr. Aaron Leon
Co-Founder & CEO
thinQ Technologies, Inc.
5420 Wade Park Blvd.
Suite 100
Raleigh, NC 27607
aaron@thinQ.com

Re: Official Correspondence from the Federal Communications Commission

Dear Mr. Leon:

We have determined that thinQ Technologies, Inc. (“thinQ”) is apparently originating and 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 apparently illegal robocalls. As noted below, downstream voice service providers will be authorized to **block all** of thinQ’s 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 (Tuesday, April 5, 2022) 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 thinQ apparently transmitted multiple illegal robocall campaigns from the sources listed in Attachment A. Additionally, the North Carolina Department of Justice identified you as a source of illegal robocall traffic.

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

1. Promptly investigate the transmissions identified in Attachment A.
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 (Tuesday, April 5, 2022) inform the Commission and the Traceback Consortium of the steps thinQ is taking to prevent

¹ See 47 CFR § 64.1200(k)(4).

customers from using its network to transmit illegal robocalls.² You must also include a declaration attesting to the truthfulness and accuracy of your response under section 1.17 of the Commission's rules.³ Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.⁴

Consequences for Failure to Comply. If after 48 hours of issuance of this letter thinQ 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 thinQ after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination.⁵ Furthermore, if thinQ 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 deadlines authorizes U.S.-based voice service providers to block all call traffic transmitting from your network, permanently.**

Please direct any inquiries or responses regarding this letter to Lisa Zaina, Supervisor Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at lisa.zaina@fcc.gov or (202) 418-2803; and cc: to Kristi Thompson, Division Chief, Telecommunications Consumers Division, Enforcement Bureau, FCC, at kristi.thompson@fcc.gov and Monica Echevarria, Attorney Advisor,

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 47 CFR § 1.17. See also 47 CFR § 1.16 (describing the format of such declarations).

⁴ You are encouraged to reach out to the Commission before the deadline if you anticipate needing more time to execute this step.

⁵ 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 7614; 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 monica.echevarria@fcc.gov. A copy of this letter has been sent to the Traceback Consortium.

Sincerely,

Loyaan A. Egal
Acting Bureau Chief
Enforcement Bureau
Federal Communications Commission

ATTACHMENT A

Customer	Date of Call	Date of ITG Notification	Caller ID	Called Number	Description	Violation
Peerless Network	Sep 30, 2021 20:05 UTC	Oct 01, 2021 18:24 UTC			Amazon- AuthorizeOrder	47 USC 227(b); 47 CFR 64.1200(a)
Brightlink	Sep 30, 2021 20:00 UTC	Oct 01, 2021 14:06 UTC			Amazon- AuthorizeOrder	47 USC 227(b); 47 CFR 64.1200(a)
Peerless Network	Sep 30, 2021 19:57 UTC	Oct 01, 2021 18:27 UTC			Amazon- SuspiciousCharge	47 USC 227(b); 47 CFR 64.1200(a)
VC SOLUTIONS	Oct 04, 2021 21:18 UTC	Oct 05, 2021 19:42 UTC			Legal-Enforcement- Notice	47 USC 227(b); 47 CFR 64.1200(a)
VC SOLUTIONS	Oct 04, 2021 19:54 UTC	Oct 05, 2021 18:36 UTC			Legal-Enforcement- Notice	47 USC 227(b); 47 CFR 64.1200(a)
VC SOLUTIONS	Oct 04, 2021 14:22 UTC	Oct 05, 2021 19:41 UTC			Legal-Enforcement- Notice	47 USC 227(b); 47 CFR 64.1200(a)
RSCoM / NGP Telecom	Oct 07, 2021 18:46 UTC	Oct 11, 2021 15:27 UTC			Utility- 30MinDisconnect	47 USC 227(b); 47 CFR 64.1200(a)
Windstream / Earthlink / One Cmctns / Deltacom	Oct 12, 2021 23:34 UTC	Oct 14, 2021 16:24 UTC			Legal-Consequences	47 USC 227(b); 47

						CFR 64.1200(a)
Comcast	Oct 12, 2021 20:58 UTC	Oct 13, 2021 16:51 UTC			Legal-Consequences	47 USC 227(b); 47 CFR 64.1200(a)
Windstream / Earthlink / One Cmctns / Deltacom	Oct 12, 2021 23:41 UTC	Oct 13, 2021 19:42 UTC			Legal-Consequences	47 USC 227(b); 47 CFR 64.1200(a)
Windstream / Earthlink / One Cmctns / Deltacom	Oct 12, 2021 21:36 UTC	Oct 14, 2021 16:26 UTC			Legal-Consequences	47 USC 227(b); 47 CFR 64.1200(a)
Comcast	Oct 12, 2021 19:31 UTC	Oct 13, 2021 18:37 UTC			Legal-Consequences	47 USC 227(b); 47 CFR 64.1200(a)
Inbound Inc Communications	Nov 02, 2021 18:09 UTC	Nov 03, 2021 14:08 UTC			Discount-DirecTV50	47 USC 227(b); 47 CFR 64.1200(a)
Inbound Inc Communications	Nov 02, 2021 18:40 UTC	Nov 03, 2021 16:18 UTC			Discount-DirecTV50	47 USC 227(b); 47 CFR 64.1200(a)
Inbound Inc Communications	Nov 02, 2021 20:34 UTC	Nov 03, 2021 14:07 UTC			Discount-DirecTV50	47 USC 227(b); 47 CFR 64.1200(a)
Inbound Inc Communications	Nov 02, 2021 19:02 UTC	Nov 03, 2021 20:05 UTC			Discount-DirecTV50	47 USC 227(b); 47 CFR 64.1200(a)
Inbound Inc Communications	Nov 02, 2021 18:24 UTC	Nov 03, 2021 13:13 UTC			Discount-DirecTV50	47 USC 227(b); 47

						CFR 64.1200(a)
Telereco/FaxBB	Feb 08, 2022 17:22 UTC	Feb 17, 2022 16:43 UTC			Automated- MoneyScheme	47 USC 227(b); 47 CFR 64.1200(a)