



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

November 10, 2022

**VIA ELECTRONIC DELIVERY AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Fawaz Saleem  
CEO  
Urth Access, LLC  
2901 W. Coast Hwy, Suite 200  
Newport Beach, CA 92663  
[f.saleem@urthaccess.com](mailto:f.saleem@urthaccess.com)

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

Dear Mr. Saleem:

We have determined that Urth Access LLC (“Urth Access”) is apparently originating illegal robocall traffic on behalf of one or more of its clients. You should investigate and, if necessary, cease transmitting any such illegal traffic immediately and take steps to prevent your network from continuing to be a source of apparent illegal robocalls.<sup>1</sup> As noted below, downstream voice service providers will be authorized **to block all of Urth Access’s traffic** if you do not (1) take steps to “effectively mitigate illegal traffic within 48 hours,” and (2) inform the Commission and the Traceback Consortium within fourteen (14) days of the date of this letter (November 25, 2022) of the steps you have taken to “implement effective measures” to prevent customers from using your network to make illegal calls.<sup>2</sup> Additionally, if you continue knowingly or negligently to originate illegal robocall campaigns after responding to this letter, **we may initiate proceedings to remove your certification from the Robocall Mitigation Database thereby requiring all intermediate providers and terminating voice service providers to cease accepting your traffic.**<sup>3</sup>

**Basis for finding apparent violations.** You are receiving this letter because our investigation revealed that Urth Access apparently originated multiple illegal robocall campaigns, as set forth in Attachment A. The Federal Communications Commission’s Enforcement Bureau (Bureau) works closely with USTelecom’s Industry Traceback Group (Traceback Consortium), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.<sup>4</sup> In October 2022, the Traceback Consortium investigated prerecorded voice message calls that customers of YouMail had

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<sup>1</sup> See 47 CFR § 64.1200(k)(4), (f)(18).

<sup>2</sup> See 47 CFR § 64.1200(k)(4).

<sup>3</sup> *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1903, para. 83 & 1904, para. 86 (2020); 47 CFR § 64.6305.

<sup>4</sup> *Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, EB Docket No. 20-22, Report and Order, DA 21-1047 (EB 2021) (*2021 Consortium Selection Order*). See also *Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act*, Pub. L. No. 116-105, 133 Stat. 3274, Sec. 13(d) (2019) (TRACED Act).

flagged as illegal robocalls made without consent.<sup>5</sup> The Traceback Consortium conducted tracebacks and determined that Urth Access originated the calls. The Traceback Consortium previously notified you of these calls and provided you access to supporting data identifying each call, as indicated in Attachment A. You responded to the Traceback Consortium and claimed that your caller customer(s) had prior express consent for the calls. You are welcome to submit evidence of this consent in response to this letter.

Even considering your assertions to the Traceback Consortium that you had consent for the calls, we find that you and your customers apparently lacked consent for the calls. You provided the Traceback Consortium “consent logs” that included website addresses that allegedly captured the called party’s consent.<sup>6</sup> Examples included “healthinsnow.org,” “gohealth.healthcare,” and “healthme.live.” None of these websites appear to have any connection with student loan assistance. Instead, all relate to health insurance or health care services. Urth Access apparently knew that these student loan robocalls were not related to health insurance.<sup>7</sup>

In addition, the consent logs apparently fail to provide adequate disclosure that would constitute consent. For example, for telemarketing calls, the Commission requires calling parties to provide “clear and conspicuous disclosure” when obtaining prior express written consent.<sup>8</sup> The websites included TCPA consent disclosures whereby the consumer agreed to receive robocalls from “marketing partners.” The consumer had to click on the hyperlink associated with “marketing partners.” The list of “marketing partners” on that second website contained the names of 5,329 entities.<sup>9</sup> We find that listing more than 5,000 “marketing partners” on a secondary website is not sufficient to demonstrate that the called parties consented to the calls. We conclude that Urth Access’s customers apparently lacked consent for the calls.<sup>10</sup> Consequently, because: (1) the websites that Urth Access has thus far referenced do not seek or obtain consent to receive robocalls about student loans; (2) the consent was accessible only if the consumer clicked on a hyperlink and reviewed a second webpage; and (3) the second webpage listed 5,329

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<sup>5</sup> See 47 U.S.C. § 227(b); 47 CFR § 64.1200(a).

<sup>6</sup> A consent log includes identifying information about a consumer such as name, telephone number, and address that the consumer allegedly entered into an online form consenting to receive robocalls.

<sup>7</sup> The Traceback Consortium notices informed Urth Access that the calls involved student loans. Traceback Consortium Subpoena Response on file at EB-TCD-22-00034232 (Oct. 25, 2022); Traceback Consortium Subpoena Response on file at EB-TCD-22-00034232 (Oct. 3, 2022). Furthermore, it appears that Urth Access and its customers are the same entity. The persons who registered the “customer” websites are individuals who appear to be employees or agents of Nathan Dawood and his companies. These individuals and companies share the same Orange County, California address as Urth Access. See Statement of Information, Global Lynks LLC, Cal. Sec’y of State (June 13, 2022); Articles of Incorporation, Urth Access, Wyo. Sec’y of State (Jan. 13, 2022); Statement of Information, Fire Data LLC, Cal. Sec’y of State (Dec. 29, 2021); Statement of Information, Dawood & Company, Cal. Sec’y of State (Oct. 26, 2021); Statement of Information, US Acquisitions LLC, Cal. Sec’y of State (Sept. 8, 2021); Contact Us, Dawood & Dawood, <http://dawoodanddawood.com/contact/> (last visited Nov. 2, 2022). These individuals are also officers or agents of Global Lynks LLC and Call Pipe, LLC, which were the targets of the Bureau’s auto warranty enforcement actions. See *Robocall Enforcement Notice to All U.S.-Based Voice Service Providers*, Public Notice DA 22-727 at 1-2 (EB 2022); *FCC Enforcement Bureau Warns All U.S.-Based Voice Service Providers to Avoid or Cease Carriage of Auto Warranty Robocall Traffic from Cox/Jones/Sumco Panama Operation*, Order, DA 22-784 at 1 (EB 2022);

<sup>8</sup> 47 CFR § 64.1200(f)(9); *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Report and Order, 27 FCC Rcd 1830, 1844, para. 33 (2012).

<sup>9</sup> Marketing Partners, <http://marketingpartners.business> (last visited Oct. 27, 2022).

<sup>10</sup> The Commission’s rules provide that, to be “clear and conspicuous,” the disclosure must inform consumers that they will “receive future calls that deliver prerecorded messages by or on behalf of a specific seller.” *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, 27 FCC Rcd at 1844, para. 33.

ostensible “marketing partners,” we conclude that Urth Access and its customers apparently lacked consent for the calls.

Further, the numerous tracebacks to Urth Access as an originator indicate that you are apparently knowingly or negligently originating illegal robocall traffic. Under our rules (and as explained further below), providers that originate illegal robocall traffic face serious consequences, including blocking by downstream providers of all of the originating provider’s traffic. To avoid such blocking, you must take corrective actions immediately.

**Actions You Should Take Now.** Urth Access 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.<sup>11</sup>
3. Implement effective safeguards to prevent customers from using your network as a platform to originate illegal calls.<sup>12</sup>
4. Within 48 hours, inform the Commission and the Traceback Consortium of steps taken to mitigate the identified apparent illegal traffic.<sup>13</sup> If you have evidence that the transmissions identified in Attachment A were legal calls, present that evidence to the Commission and the Traceback Consortium.
5. Within fourteen (14) days of the date of this letter (November 25, 2022) inform the Commission and the Traceback Consortium of the steps Urth Access is taking to prevent customers from using its network to transmit illegal robocalls (i.e. robocall mitigation measures).<sup>14</sup> Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.<sup>15</sup>

**Consequences for Failure to Comply.** If after 48 hours of issuance of this letter Urth Access 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 Urth Access after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination.<sup>16</sup> If Urth Access fails to take sufficient mitigating actions to prevent new and renewing

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<sup>11</sup> 47 CFR § 64.1200(f)(18), (k)(4).

<sup>12</sup> 47 CFR § 64.1200(k)(4).

<sup>13</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. 42 (2020) (*Call Blocking Safe Harbor Report and Order*).

<sup>14</sup> See *id.* at 7630, para. 43 (2020).

<sup>15</sup> You are encouraged to reach out to the Commission before the deadline if you anticipate needing more time to execute this step.

<sup>16</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. 37; 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

customers from using its network to originate 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.**

Furthermore, if you fail to take the actions listed above, or knowingly or negligently continue to originate unlawful robocall campaigns after responding to this letter, we may find that your certification in the Robocall Mitigation Database is deficient and direct the removal of your certification from the database.<sup>17</sup> Removal of a certification from the Robocall Mitigation Database requires all intermediate providers and terminating voice service providers to immediately cease accepting all of your calls.<sup>18</sup> **Continued origination of illegal robocalls following this notice and opportunity to take action to prevent such illegal robocalls will be used as evidence of a defective certification, and we may initiate proceedings to remove your certification from the Robocall Mitigation Database.**<sup>19</sup> You will have an opportunity to respond to that notice.<sup>20</sup>

Please direct any inquiries or responses regarding this letter to Daniel Stepanicich, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at [daniel.stepanicich@fcc.gov](mailto:daniel.stepanicich@fcc.gov) or (202) 418-7451; and cc: to Kristi Thompson, Division Chief, Telecommunications Consumers Division, Enforcement Bureau, FCC, at [kristi.thompson@fcc.gov](mailto:kristi.thompson@fcc.gov). A copy of this letter has been sent to the Traceback Consortium.

Sincerely,

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Loyaan A. Egal  
Bureau Chief  
Enforcement Bureau  
Federal Communications Commission

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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)(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).

<sup>17</sup> See *Call Authentication Trust Anchor*, 36 FCC Rcd at 1903, para. 83.

<sup>18</sup> 47 CFR § 64.6305(e). See *Call Authentication Trust Anchor*, 36 FCC Rcd at 1904, para. 86; *Wireline Competition Bureau Announces Opening of Robocall Mitigation Database and Provides Filing Instructions and Deadlines*, WC Docket No. 17-97, Public Notice, DA 21-454 (WCB Apr. 20, 2021).

<sup>19</sup> See *Call Authentication Trust Anchor*, 36 FCC Rcd at 1902-03, 1905, paras. 81-83, 88.

<sup>20</sup> *Id.* at 1905, para. 88.

**ATTACHMENT A**

<b>Customer</b>	<b>Date of Call</b>	<b>Date of ITG Notification</b>	<b>Caller ID</b>	<b>Called Number</b>	<b>Description</b>	<b>Violation</b>
Go Health	Oct 11, 2022 21:44 UTC	Oct 12, 2022 15:20 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Get Your Health Now	Oct 11, 2022 16:37 UTC	Oct 12, 2022 18:38 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Healthcare Info	Oct 11, 2022 15:12 UTC	Oct 12, 2022 18:31 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Go Health	Oct 11, 2022 17:52 UTC	Oct 12, 2022 18:37 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
medhealthnow	Oct 11, 2022 18:03 UTC	Oct 12, 2022 15:18 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
healthcareinfo	Oct 11, 2022 15:40 UTC	Oct 12, 2022 18:35 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Dynamic Health	Oct 11, 2022 17:28 UTC	Oct 12, 2022 13:36 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Go Health	Oct 11, 2022 17:59 UTC	Oct 12, 2022 13:40 UTC			StudentLoan-Payments-P1	47 USC 227(b); 47

						CFR 64.1200(a)
Health Now	Oct 11, 2022 22:31 UTC	Oct 13, 2022 21:22 UTC			StudentLoan- Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Healthcare Info	Oct 11, 2022 15:42 UTC	Oct 12, 2022 21:51 UTC			StudentLoan- Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Healthcare Info	Oct 11, 2022 16:25 UTC	Oct 12, 2022 21:53 UTC			StudentLoan- Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Health Labs	Oct 11, 2022 16:43 UTC	Oct 13, 2022 21:21 UTC			StudentLoan- Payments-P1	47 USC 227(b); 47 CFR 64.1200(a)
Health Me	Oct 27, 2022 21:57 UTC	Oct 28, 2022 15:07 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Health Now 123	Oct 27, 2022 21:58 UTC	Oct 28, 2022 21:11 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Health Me	Oct 27, 2022 21:59 UTC	Oct 28, 2022 16:46 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Health Now 123	Oct 27, 2022 22:00 UTC	Oct 28, 2022 19:42 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Medhealth	Oct 27, 2022 22:00 UTC	Oct 31, 2022 13:45 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47

						CFR 64.1200(a)
GetYourHealth NOW	Oct 27, 2022 22:04 UTC	Oct 31, 2022 10:43 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Medhealth	Oct 27, 2022 22:05 UTC	Oct 31, 2022 14:43 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Healthhq	Oct 28, 2022 14:13 UTC	Oct 31, 2022 15:28 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Healthlabs	Oct 28, 2022 15:32 UTC	Oct 31, 2022 18:13 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Yourhealthmatters	Oct 28, 2022 15:40 UTC	Oct 31, 2022 15:30 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Getyourhealth-now	Oct 28, 2022 15:47 UTC	Nov 01, 2022 11:55 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)
Getyourhealth-now	Oct 28, 2022 16:17 UTC	Oct 31, 2022 18:11 UTC			StudentLoan-\$10,000- Removal	47 USC 227(b); 47 CFR 64.1200(a)