



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

January 11, 2023

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

To: Corey Seaman
CEO
Vultik Inc.
312 W 2nd St.
Suite 2104
Casper, WY 82601
support@vultik.com

Re: Notice of Suspected Illegal Robocall Traffic

Dear Mr. Seaman:

We have determined that Vultik Inc (Vultik) is apparently originating illegal robocall traffic on behalf of one or more of its clients. As explained more fully below, this letter provides notice of important legal obligations and steps you must take to address this apparent illegal traffic. You should investigate the identified traffic and take the steps described below, including blocking the traffic if necessary, and take steps to prevent your network from continuing to be a source of apparently illegal robocalls. Failure to comply with the steps outlined in this letter **may result in downstream voice service providers blocking all of Vultik's traffic, permanently.**

Why You Are Receiving This Letter. You are receiving this letter because one or more investigations that the Federal Communications Commission (FCC or Commission) conducted, in conjunction with the USTelecom's Industry Traceback Group (Traceback Consortium), revealed that Vultik apparently originated multiple illegal robocall campaigns from the sources listed in Attachment A. The Commission's Enforcement Bureau (Bureau) works closely with the Traceback Consortium, which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.¹ Between June 1 and October 19, 2022, the Traceback Consortium investigated prerecorded voice message calls that customers of YouMail had flagged as robocalls made to wireless numbers without consent.² The Traceback Consortium conducted tracebacks and determined that Vultik originated the calls. The Traceback Consortium previously notified you of these calls and provided you access to supporting data

¹ *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 22-870, para. 40 (EB 2022). *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).

² *See* 47 U.S.C. § 227(b) (stating that it is unlawful to make using an automated telephone dialing system or a prerecorded voice to a telephone number assigned to a cellular telephone service without prior express consent, unless the call is made for emergency purposes); 47 CFR § 64.1200(a) (same).

identifying each call, as indicated in Attachment A. Further, the numerous tracebacks to Vultik 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.

Applicable FCC Rules. This letter is based on FCC rules that apply to originating providers like Vultik. **First**, under the safe harbor set forth in section 64.1200(k)(4), any provider may block all traffic from an originating provider that, when notified by the Commission, fails to effectively mitigate illegal traffic within 48 hours or fails to implement effective measures to prevent new or renewing customers from using its network to originate illegal calls. This letter provides notice under 64.1200(k)(4) and describes the mitigation steps you must take. **Second**, section 64.6305(e) permits providers to accept calls directly from an originating provider only if that originating provider's filing appears in the FCC's Robocall Mitigation Database. As explained below, if you continue to transmit illegal robocalls, the Bureau may initiate proceedings to remove your certification from the database, thereby requiring providers to cease accepting calls directly from Vultik. **Third**, we note that sections 64.1200(n) and 64.6305 prescribe various additional obligations for mitigating and preventing illegal robocalls. We remind you that failure to comply with any of these obligations may result in additional enforcement action pursuant to the Communications Act and our rules.³

Mitigation Requirements Under Section 64.1200(k)(4). This letter serves as a notice that you must immediately take certain actions to address the identified apparently illegal traffic in order to avoid downstream providers blocking *all* of Vultik's traffic.⁴ Specifically you should:

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.⁵
3. Implement effective safeguards to prevent customers from using your network as a platform to originate illegal calls.⁶
4. Within 48 hours of the time stamp on the e-mail transmission of this letter, inform the Commission and the Traceback Consortium of steps taken to mitigate the identified apparent illegal traffic.⁷ 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 (January 25, 2023), inform the Commission and the Traceback Consortium of the steps Vultik is taking to prevent new or renewing customers from using its network to originate illegal robocalls.⁸ You must also include a declaration attesting to the truthfulness and accuracy of your response

³ 47 U.S.C. § 503; 47 CFR §§ 64.1200(n), 64.6305.

⁴ 47 CFR § 64.1200(k)(4).

⁵ *Id.*; 47 CFR § 64.1200(f)(18).

⁶ 47 CFR § 64.1200(k)(4).

⁷ *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*).

⁸ *See id.* at 7630, para. 43.

under section 1.17 of the Commission's rules.⁹ Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.¹⁰

If after 48 hours Vultik continues to originate unlawful robocall traffic from the entities involved in these campaigns, downstream U.S.-based voice service providers may begin blocking all calls from Vultik after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination.¹¹ Furthermore, if after 14 days, Vultik has not taken sufficient actions to prevent its network from continuing to be used to transmit illegal robocalls, then downstream U.S.-based providers may block Vultik's calls following notice to the Commission.¹² **U.S.-based voice service providers may block ALL call traffic transmitting from your network if you fail to act within either deadline.**

Additional Consequences Under 64.6305(e) and Other Robocalling Rules. If you fail to take the actions listed above, or knowingly or negligently continue to originate illegal robocalls after responding to this letter, you may be subject to additional consequences. **Continued transmission of illegal robocalls following this notice may be used as evidence that your certification in the Robocall Mitigation Database is deficient, and the Bureau may initiate proceedings to remove your certification from the database.**¹³ If your certification is removed from the Robocall Mitigation Database, all intermediate providers and terminating voice service providers must immediately cease accepting all of your calls.¹⁴ If the Bureau initiates a proceeding to remove your certification from the Robocall Mitigation Database, you will have an opportunity to respond.¹⁵ Finally, Vultik may also be subject to additional enforcement penalties, including monetary penalties, for failing to take steps to address illegal robocall traffic on its network as required by the Commission's rules.¹⁶

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 or (202) 418-7451; and cc: to Kristi Thompson, Division Chief,

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

¹⁰ You are encouraged to reach out to the Commission before the deadline if you anticipate needing more time to execute this step.

¹¹ 47 CFR § 64.1200(k)(4); *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7628-30, paras. 39, 42.

¹² 47 CFR § 64.1200(k)(4); *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7628-30, paras. 39, 43.

¹³ *See Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902-03, para. 83 (2020) (*Second Caller ID Authentication Report and Order*); *see also* 47 CFR § 64.6305(c) (prescribing Robocall Mitigation Database certification requirements for originating providers).

¹⁴ 47 CFR § 64.6305(e). *See Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1904, para. 86.

¹⁵ *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1903, para. 83.

¹⁶ *See* 47 CFR § 64.1200(n)(1)-(3), (prescribing steps voice service providers must take to address and prevent illegal robocalls); *Second Caller ID Authentication Report and Order*, 36 FCC Rcd at 1902, para. 83. *See also* 47 U.S.C. § 503 (providing that a forfeiture penalty may be imposed on any person who willfully or repeatedly violates the Commission's rules).

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

Sincerely,

Loyaan A. Egal
Chief
Enforcement Bureau
Federal Communications Commission

ATTACHMENT A

Customer	Date of ITG Notification	Date of Call	Caller ID	Called Number	Description	Violation
Right Communications and Marketing	Jun 17, 2022 15:23 UTC	Jun 15, 2022 14:57 UTC			Amazon- AuthorizeOrder	47 USC 227(b); 47 CFR 64.1200(a)
Right Communications and Marketing	Jun 17, 2022 14:23 UTC	Jun 15, 2022 21:30 UTC			Amazon- AuthorizeOrder	47 USC 227(b); 47 CFR 64.1200(a)
Right Communications and Marketing	Jun 16, 2022 14:48 UTC	Jun 15, 2022 13:18 UTC			Amazon- AuthorizeOrder	47 USC 227(b); 47 CFR 64.1200(a)
Admy Telecom Inc	Jun 20, 2022 16:48 UTC	Jun 15, 2022 17:47 UTC			Amazon- AuthorizeOrder	47 USC 227(b); 47 CFR 64.1200(a)
Right Communications and Marketing	Jun 17, 2022 15:03 UTC	Jun 14, 2022 20:04 UTC			Amazon- AuthorizeOrder	47 USC 227(b); 47 CFR 64.1200(a)
Admy Telecom Inc	Jun 21, 2022 16:51 UTC	Jun 17, 2022 17:52 UTC			Amazon- SuspiciousCharge- P1	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 23, 2022 14:00 UTC	Jun 22, 2022 23:04 UTC			StudentLoan- ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 23, 2022 14:01 UTC	Jun 22, 2022 22:56 UTC			StudentLoan- ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 23, 2022 13:58 UTC	Jun 22, 2022 18:13 UTC			StudentLoan- ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)

Maximum Management Services	Jun 23, 2022 16:14 UTC	Jun 22, 2022 17:35 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 23, 2022 17:43 UTC	Jun 22, 2022 22:48 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 23, 2022 13:43 UTC	Jun 22, 2022 17:40 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 28, 2022 00:12 UTC	Jun 22, 2022 17:40 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 24, 2022 11:21 UTC	Jun 22, 2022 17:39 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 24, 2022 11:18 UTC	Jun 22, 2022 17:35 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Maximum Management Services	Jun 24, 2022 11:19 UTC	Jun 22, 2022 17:33 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
Admy Telecom Inc	Jun 24, 2022 01:18 UTC	Jun 16, 2022 19:57 UTC			Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
Ran Infotech	Jun 27, 2022 23:53 UTC	Jun 16, 2022 19:46 UTC			SSA-P1-TexasFraud (GovtImpers)	47 USC 227(b); 47 CFR 64.1200(a)
Ican	Jul 06, 2022 10:02 UTC	Jun 22, 2022 19:49 UTC			Amazon-Impers-P2	47 USC 227(b); 47 CFR 64.1200(a)
StudentLoan-ForgivenessCenter	Jul 29, 2022 18:56 UTC	Jul 28, 2022 17:31 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)

StudentLoan-ForgivenessCenter	Jul 29, 2022 17:15 UTC	Jul 28, 2022 18:16 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
StudentLoan-ForgivenessCenter	Jul 29, 2022 19:41 UTC	Jul 28, 2022 17:18 UTC			StudentLoan-ForgivenessCenter	47 USC 227(b); 47 CFR 64.1200(a)
MY BUSINESS VOIP	Oct 19, 2022 18:53 UTC	Oct 18, 2022 16:00 UTC			Utility- 30MinDisconnect	47 USC 227(b); 47 CFR 64.1200(a)