



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

August 1, 2023

VIA ELECTRONIC DELIVERY AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: One Owl Telecom Inc.
Aashay Khandelwal
CEO
1519 York Road
Lutherville, MD 21093
aashay.khandelwal@oneowltelecom.com

Re: Notification of Suspected Illegal Robocall Traffic

Dear Mr. Khandelwal,

One Owl Telecom Inc. (One Owl or Company) is a gateway provider¹ and originator, and in that capacity is apparently transmitting and originating illegal robocall traffic. As explained more fully below, this letter provides notice of important legal obligations and steps One Owl must take to address this apparent illegal traffic. The Company should investigate the identified traffic and take the steps described below, including blocking the traffic if necessary, and take action to prevent its 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 One Owl's traffic, permanently.**

Why One Owl Is Receiving This Letter. The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) works closely with the USTelecom's Industry Traceback Group (Traceback Consortium), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.² Between February 3, 2023 and May 31, 2023, the Traceback Consortium investigated prerecorded voice message calls placed to Verizon and YouMail³ customer numbers without requisite consent under the Communications Act and our rules.⁴ The calls included

¹ A company is a gateway provider if it is a U.S.-based intermediate provider that receives a call directly from a foreign originating provider or foreign intermediate provider at its U.S.-based facilities before transmitting the call downstream to another U.S.-based provider. See 47 CFR § 64.1200(f)(19). "U.S.-based" means that the provider has facilities located in the United States, including a point of presence capable of processing the call. "Receives a call directly" from a provider means the foreign provider directly upstream of the gateway provider in the call path sent the call to the gateway provider, with no providers in-between. *Id.*

² *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).

³ YouMail is a third-party robocall identification and blocking service. See YouMail, About Us, <https://www.youmail.com/> (last visited July 28, 2023) ("YouMail protects consumers, enterprises, and carriers from harmful phone calls. Our apps, YouMail, Another Number, and HulloMail, protect US and UK consumers by answering over a billion live calls per year.").

⁴ See 47 U.S.C. § 227(b) (requiring callers obtain consent before placing certain types of pre-recorded calls); 47 CFR § 64.1200(a) (same).

messages concerning a fictitious purchase order purportedly associated with the called party.⁵ Some calls purported to be from “AMC Trading LLC” and stated that “your product is ready to ship.”⁶ The calls asked consumers to confirm the order.⁷ Other calls stated that a “pre-authorized order” had been “placed on your name.”⁸ The call did not state what the order was for or where the order was placed.⁹ The Traceback Consortium conducted tracebacks and determined that One Owl acted as the gateway or originating provider for the calls.¹⁰ The Traceback Consortium notified One Owl of these calls, including supporting data identifying each call, as shown in Attachment A.¹¹ One Owl claimed to have warned its clients about transmitting illegal traffic and terminated some originators.¹² However, the illegal traffic persisted.¹³

One Owl is no stranger to the rules cited in this letter because it is closely connected to two companies that have been recipients of similar Bureau enforcement letters, Illum Telecommunication LLC (Illum) and One Eye LLC (One Eye).¹⁴ In response to the FCC’s enforcement action against Illum in October 2021, the CEO and Director of Illum, Prince Anand (Anand), who sometimes uses the alias “Frank Murphy,”¹⁵ created One Eye.¹⁶ To deflect the FCC’s scrutiny, Anand intended to keep his name off One Eye’s corporate documents.¹⁷ Kaushal Bhavsar, a director of Illum, became One Eye’s CEO.¹⁸ Aashay Khandelwal, the Human Resource Representative for Illum, subsequently formed One Owl and

⁵ See ITG Subpoena Response on file at EB-TCD-20-00031678 (Mar. 3, 2023) (March ITG Subpoena Response); see also ITG Subpoena Response on file at EB-TCD-20-00031678 (Apr. 17, 2023) (April ITG Subpoena Response); see also ITG Subpoena Response on file at EB-TCD-20-00031678 (June 22, 2023) (June ITG Subpoena Response).

⁶ See March ITG Subpoena Response.

⁷ See *id.*; April ITG Subpoena Response; June ITG Subpoena Response.

⁸ See March ITG Subpoena Response; April ITG Subpoena Response; June ITG Subpoena Response.

⁹ See March ITG Subpoena Response; April ITG Subpoena Response; June ITG Subpoena Response.

¹⁰ See March ITG Subpoena Response; April ITG Subpoena Response; June ITG Subpoena Response.

¹¹ See March ITG Subpoena Response, *supra* note 5; April ITG Subpoena Response, *supra* note 5; June ITG Subpoena Response, *supra* note 5.

¹² See March ITG Subpoena Response, *supra* note 5.

¹³ See April ITG Subpoena Response, *supra* note 5; June ITG Subpoena Response, *supra* note 5.

¹⁴ See Letter from Rosemary C. Harold, Chief, Enforcement Bureau, to Prince Anand, CEO, PZ/Illum Telecommunication LLC (Oct. 21, 2021); Letter from Loyaan A. Egal, Chief, Enforcement Bureau, to Kaushal Bhavsar, CEO, One Eye LLC (Feb. 15, 2023) (One Eye Letter). These letters are available on the Commission’s website at <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist>.

¹⁵ Prince Anand Skype Chat, June 10, 2021 at 8:18:53 AM (“Frank Murphy” introduces himself as Prince Anand) (on file at EB-TCD-20-00030805) (Anand Skype Chat).

¹⁶ *Id.* at October 24, 2021 at 8:16:14 AM and 8:16:21 AM (Anand telling Great Choice Telecom to expect a new sign up under the name “One Eye” that day).

¹⁷ *Id.* at 7:40:25 AM, 8:11:13 AM, 8:13:20 AM, 8:14:48 AM, 8:14:55 AM, 8:15:04 AM, 8:16:14 AM, 8:55:50 AM, 9:01:49 AM, 9:02:21 AM, and 9:02:26 AM (Anand explains that due to the Commission’s cease and desist letter he will “not be included in any companies” but will work “on the backend [sic]”).

¹⁸ One Eye LLC Listing, Fed. Comm’n’s Comm’n, Robocall Mitigation Database (Oct. 26, 2021), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robotcall_mitigation_database&sys_id=9e1373b31b53b0107ccf20ecac4bcb3b&view=sp (showing Bhavsar as CEO of One Eye); Illum Telecommunication, <https://www.illumtelecommunication.com/> (last visited July 14, 2023) (showing Bhavsar as Director of Illum).

became the CEO.¹⁹ Julya Barros, a seemingly close acquaintance of Anand,²⁰ became Vice President of Sales and Marketing at One Owl.²¹ One Owl and One Eye used the same IP address to conduct their business.²² One Owl and One Eye communicated under the same email domain, @oneeyetelecom.com.²³ One Owl and One Eye also shared customers that the FCC has explicitly identified as the source of illegal traffic.²⁴ The personnel connections between One Owl, One Eye, and Illum are summarized in the table below.

INDIVIDUALS	COMPANIES
Aashay Khandelwal , resident of Maryland ²⁵ , with a presence in Las Vegas, Nevada, ²⁶ and Mumbai, India ²⁷	CEO at One Owl ²⁸ Human Resources Representative at Illum ²⁹
Julya Barros , resident of Mumbai, India ³⁰ and Dubai, United Arab Emirates ³¹	Vice President of Sales and Marketing at One Owl ³²

¹⁹ See Illum Telecommunication, <https://www.illumtelecommunication.com/> (last visited July 14, 2023); see also One Owl Telecom Inc. Listing, Fed. Commc'ns Comm'n, Robocall Mitigation Database (Apr. 25, 2022), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robotcall_mitigation_database&sys_id=b1ab8b061bcb4110823a419ae54bcb64&view=sp (showing Khandelwal as the CEO of One Owl).

²⁰ Compare @illum_telecom, Twitter, https://twitter.com/illum_telecom?lang=hi (as archived by Google and last visited May 16, 2023) (screenshots on file at EB-TCD-20-00030805), with Julya Barros (@julyabarross), Instagram, <http://www.instagram.com/julyabarross> (last visited July 14, 2023).

²¹ See Julya Barros, LinkedIn, <https://ae.linkedin.com/in/julya-barros-928008245> (last visited July 14, 2023) (screenshots on file at EB-TCD-20-00030805).

²² March ITG Subpoena Response, *supra* note 5.

²³ Compare Incorp Services Interrogatories Response at para. 15 (on file at EB-TCD-20-00030805) (Incorp Services Interrog.) (showing One Eye used the @oneeyetelecom.com domain), with *id.* at para. 3 and Ex. A (on file at EB-TCD-20-00030805) (showing One Owl used the @oneeyetelecom.com domain).

²⁴ Compare One Eye Letter, *supra* note 14, at Ex. A (identifying Mavtel Voip and Clevertel as the source of illegal traffic), with Exhibit A hereto (identifying Mavtel Voip and Clevertel as the source of illegal traffic).

²⁵ See Aashay Khandelwal, LinkedIn, <https://www.linkedin.com/in/aashay-khandelwal-ab6179238> (last visited July 13, 2023) (screenshots on file at EB-TCD-20-00030805).

²⁶ See *id.*

²⁷ See Incorp Services Interrog. at para. 3.

²⁸ One Owl Telecom Inc. Listing, Fed. Commc'ns Comm'n, Robocall Mitigation Database (Apr. 25, 2022), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robotcall_mitigation_database&sys_id=b1ab8b061bcb4110823a419ae54bcb64&view=sp (showing Khandelwal as the CEO of One Owl).

²⁹ Illum Telecommunication, <https://www.illumtelecommunication.com/> (last visited July 14, 2023).

³⁰ See Julya Barros (@julyabarross), Instagram, <http://www.instagram.com/julyabarross/> (last visited July 14, 2023) (screenshots on file at EB-TCD-20-00030805).

³¹ See Julya Barros, LinkedIn, <https://ae.linkedin.com/in/julya-barros-928008245> (last visited July 13, 2023) (screenshots on file at EB-TCD-20-00030805).

³² See *id.*

INDIVIDUALS	COMPANIES
Prince Anand, also known as Frank Murphy, ³³ with a presence in Mumbai, India ³⁴ and Dubai, United Arab Emirates ³⁵	CEO & Director at Illum ³⁶ De facto Founder of One Eye ³⁷
Kaushal Bhavsar, resident of Ahmedabad, Gujarat, India, ³⁸ with a presence in Delaware ³⁹	Director at Illum ⁴⁰ CEO at One Eye ⁴¹

Efforts to operate under the cloak of ever-changing corporate formations to serve the same dubious clientele demonstrate willful attempts to circumvent the law to originate and carry illegal traffic.

Under our rules, as explained further below, gateway and originating providers that transmit illegal robocall traffic face serious consequences, **including blocking by downstream providers of all of the provider's traffic.** To avoid such blocking, One Owl must take corrective actions immediately.

Applicable FCC Rules. This letter is based on several FCC rules that apply to gateway providers or originators such as One Owl.

First, section 64.1200(n)(5) requires gateway providers to block all identified illegal traffic and any substantially similar traffic (unless investigation determines that the traffic is not illegal) when it receives a "Notification of Suspected Illegal Traffic" from the Bureau. This letter provides that notice, summarizes the steps that must be taken in response, and describes what will happen if One Owl continues to transmit identified traffic, including an FCC order directing all providers immediately downstream from One Owl to block all traffic from the Company.

Second, section 64.1200(n)(2) requires all voice providers to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission. Under the safe harbor set forth in section 64.1200(k)(4), any downstream provider may block all traffic from an upstream originating or intermediate 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 and renewing customers from using its network to originate illegal calls. This letter provides notice to One Owl, describes what mitigation steps it must take pursuant to 64.1200(n)(2), and provides notice to other providers pursuant to 64.1200(k)(4).

Third, section 64.6305(e) permits providers to accept calls directly from a gateway or originating provider only if that gateway or originating provider's filing appears in the FCC's Robocall Mitigation Database. As explained below, if One Owl continues to transmit illegal robocalls, the Bureau may initiate

³³ Anand Skype Chat, *supra* note 15, at June 10, 2021 at 8:18:53 PM.

³⁴ *Id.* at June 17, 2021 at 3:26:34 PM.

³⁵ *Id.* at November 30, 2021 at 3:53:35 AM.

³⁶ See Illum Telecommunication, <https://www.illumtelecommunication.com/> (last visited July 14, 2023).

³⁷ Anand Skype Chat, *supra* note 15, at October 24, 2021 at 9:02:21 AM.

³⁸ See Kaushal Bhavsar, LinkedIn, <https://in.linkedin.com/in/kaushal-bhavsar-a69a3a255> (last visited July 13, 2023) (screenshots on file at EB-TCD-20-00030805).

³⁹ See One Eye LLC, Fed. Commc'ns Comm'n, Form 499 Filer Database, Detailed Information, <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834729> (last visited July 14, 2023).

⁴⁰ Illum Telecommunication, <https://www.illumtelecommunication.com/> (last visited July 14, 2023).

⁴¹ One Eye LLC Listing, Fed. Commc'ns Comm'n, Robocall Mitigation Database (Oct. 26, 2021), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=9e1373b31b53b0107ccf20ecac4bcb3b&view=sp.

proceedings to remove its certification from the database, thereby requiring providers to cease accepting calls directly from One Owl.

Fourth, sections 64.1200(n) and 64.6305 prescribe various additional obligations for mitigating and preventing illegal robocalls. We remind One Owl that failure to comply with any of these obligations may result in additional enforcement action pursuant to the Communications Act and our rules.⁴²

Notification of Suspected Illegal Traffic Under Section 64.1200(n)(5). This letter serves as the “Notification of Suspected Illegal Traffic” required by the Commission’s mandatory blocking rules applicable to gateway providers.⁴³ One Owl must take the following actions in response to this notice:

1. Promptly investigate the transmissions identified in Attachment A for which One Owl served as the gateway provider (denoted with the term “GP” in the first column of the chart).⁴⁴
2. If the Company’s investigation determines that One Owl served as the gateway provider for the identified transmissions, block all of the identified traffic within 14 days of the date of transmission of this letter and continue to block the identified gateway traffic as well as substantially similar traffic on an ongoing basis.⁴⁵
3. Within 14 days of the date of transmission of this letter, report the results of the Company’s investigation to the Bureau.⁴⁶ Depending on the outcome of the investigation, the report must contain certain details, which are set forth below.
 - a. If One Owl determines it is the gateway provider for the identified traffic, the report should include a certification that One Owl is blocking the traffic and will continue to do so and a description of the Company’s plan to identify and block substantially similar traffic on an ongoing basis.⁴⁷
 - b. If One Owl determines that the identified gateway traffic is not illegal, the report must provide an explanation as to why One Owl reasonably concluded that the identified traffic is not illegal and what steps it took to reach that conclusion.⁴⁸
 - c. If One Owl determines that it did not serve as the gateway provider for the identified traffic, the report must provide an explanation as to how it reached that conclusion and identify the upstream provider(s) from which the Company received the identified traffic.⁴⁹ One Owl should also take lawful steps to effectively mitigate this traffic.⁵⁰

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

⁴³ 47 CFR § 64.1200(n)(5); *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Sixth Report and Order in CG Docket No. 17-59, Fifth Report and Order in WC Docket No. 17-97, Order on Reconsideration in WC Docket No. 17-97, Order, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, and Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, FCC 22-37, para. 80 (2022) (*Gateway Provider Order*).

⁴⁴ 47 CFR § 64.1200(n)(5)(i)(A).

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.* § 64.1200(n)(5)(i)(A)(1-2).

⁴⁸ *Id.* § 64.1200(n)(5)(i)(B).

⁴⁹ *Id.*

⁵⁰ *Id.*

- d. If One Owl determines that it is the originating provider, or if the traffic otherwise comes from a source that does not have direct access to the Public Switched Telephone Network, the Company must promptly comply with section 64.1200(n)(2) of the Commission's rules by effectively mitigating the identified traffic and reporting to the Bureau any steps One Owl has taken to effectively mitigate the identified traffic.⁵¹

If One Owl fails to respond to this letter, provides an insufficient response, or continues to act as the gateway provider for the traffic identified in Attachment A or substantially similar traffic, we may ultimately direct all downstream providers to block the Company's traffic.⁵² We will publish and release an Initial Determination Order stating that One Owl is not in compliance with section 64.1200(n)(5) of the Commission's rules and provide One Owl with an opportunity to respond.⁵³ If we determine that the Company's response was inadequate or it continues to transmit the traffic identified in Attachment A, or substantially similar traffic, we will publish a Final Determination Order in EB Docket No. 22-174 **directing all downstream providers to both block and cease accepting all traffic that they receive from One Owl beginning 30 days from release of the Final Determination Order.**⁵⁴

Other Mitigation Requirements Under Section 64.1200(k)(4) and (n). This letter also serves as notice that One Owl must immediately take certain actions to address the identified apparently illegal traffic in order to avoid downstream providers blocking *all* of the Company's traffic.⁵⁵ Specifically, One Owl should:

1. Promptly investigate each transmission identified in Attachment A;⁵⁶
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;⁵⁷
3. Implement effective safeguards to prevent customers from using One Owl's network as a platform to originate illegal calls;⁵⁸
4. Within 48 hours of the time stamp on the email transmitting this letter, inform the Commission and the Traceback Consortium of steps taken to mitigate the identified apparent illegal traffic.⁵⁹ If One Owl has evidence that the transmissions identified in Attachment A were legal calls, it should present that evidence to the Commission and the Traceback Consortium;⁶⁰ and

⁵¹ *Id.*

⁵² *Id.* § 64.1200(n)(5)-(6).

⁵³ *Id.* § 64.1200(n)(5)(ii).

⁵⁴ *Id.* § 64.1200(n)(5)-(6); *see also id.* § 64.1200(n)(5)(iii) ("A Final Determination Order may be issued up to one year after the release date of the Initial Determination Order.").

⁵⁵ *Id.* § 64.1200(k)(4).

⁵⁶ *Id.* § 64.1200(n)(2).

⁵⁷ *Id.*; *see also id.* § 64.1200(f)(18) ("The term effectively mitigate means identifying the source of the traffic and preventing that source from continuing to originate traffic of the same or similar nature."); *id.* § 64.1200(k)(4).

⁵⁸ *Id.* § 64.1200(n)(3); *see also id.* § 64.1200(k)(4); *see also Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Fourth Report and Order, 35 FCC Rcd 15221, 15232-33, paras. 32-36 (2020).

⁵⁹ 47 CFR §§ 64.1200(k)(4), 64.1200(n)(2); *see also 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*).

⁶⁰ *See* 47 CFR § 64.1200(n)(2).

5. Within 14 days of the email transmitting this letter, inform the Commission and the Traceback Consortium of the steps One Owl is taking to prevent new or renewing customers from using its network to transmit illegal robocalls.⁶¹ The Company must also include a declaration attesting to the truthfulness and accuracy of its response.⁶² Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.⁶³

If after 48 hours One Owl fails to effectively mitigate illegal traffic, or after 14 days fails to implement effective measures to prevent new and renewing customers from using its network to originate calls, downstream U.S.-based voice service providers may begin blocking all calls from One Owl after notifying the Commission of their decision and providing a brief summary of their basis for making such a determination.⁶⁴ **U.S.-based voice service providers may block ALL call traffic transmitting from One Owl's network if it fails to act within either deadline.** Finally, One Owl 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.⁶⁵

Additional Consequences Under Section 64.6305(e) and Other Robocalling Rules. If One Owl fails to take the actions listed above, or knowingly or negligently continues to carry or process illegal robocalls after responding to this letter, it may be subject to additional consequences. **Continued origination or transmission of illegal robocalls following this notice may be used as evidence that One Owl's certification in the Robocall Mitigation Database is deficient, and the Bureau may initiate proceedings to remove its certification from the database.**⁶⁶ If One Owl's certification is removed from the Robocall Mitigation Database, all intermediate providers and terminating voice service providers must immediately cease accepting all of the Company's calls.⁶⁷ If the Bureau initiates a proceeding to remove the Company's certification from the Robocall Mitigation Database, One Owl will have an opportunity to respond.⁶⁸

Please direct any inquiries regarding this letter to Daniel Stepanicich, Assistant Division Chief, 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,

⁶¹ See *id.* §§ 64.1200(k)(4), (n)(3); see also *Call Blocking Safe Harbor Report and Order* at 7630, para. 43.

⁶² See 47 CFR § 1.16; see also *id.* § 1.17.

⁶³ See *Call Blocking Safe Harbor Report and Order* at 7630, para. 43. One Owl is encouraged to reach out to the Commission before the deadline if it anticipates needing more time to execute this step.

⁶⁴ 47 CFR § 64.1200(k)(4).

⁶⁵ See *id.* § 64.1200(n)(1)-(4), (o) (prescribing steps voice service providers must take to address and prevent illegal robocalls); *Gateway Provider Order*, *supra* note 43, para. 40 (citing *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902, para. 83 (2020)); 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).

⁶⁶ See *Gateway Provider Order*, *supra* note 43, at para. 40; see also 47 CFR § 64.6305(d) (prescribing Robocall Mitigation Database certification requirements for gateway providers); see also *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1903, para. 83 (2020); 47 CFR § 64.6305(c) (prescribing Robocall Mitigation Database certification requirements for voice service providers).

⁶⁷ 47 CFR § 64.6305(e); see *Gateway Provider Order*, *supra* note 43, at para. 44; see also *Call Authentication Trust Anchor*, 36 FCC Rcd at 1903-04, paras. 83, 86 (shifting the obligations previously codified in 64.6305(c) to 64.6305(e)).

⁶⁸ *Gateway Provider Order*, *supra* note 43, at para. 40.

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

Sincerely,

Loyaan A. Egal
Bureau Chief
Enforcement Bureau
Federal Communications Commission

ATTACHMENT A

Role	Customer	Call Date & Time	Date of ITG Notification	Calling No.	Called No.	Description	Violation
ORG ⁶⁹	Mak Telecom	Feb 03, 2023 15:46 UTC	Feb 08, 2023 13:47 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Mak Telecom	Feb 09, 2023 15:39 UTC	Feb 11, 2023 03:48 UTC	[REDACTED]	[REDACTED]	Recent-Purchase	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Mak Telecom	Feb 09, 2023 13:37 UTC	Feb 12, 2023 16:11 UTC	[REDACTED]	[REDACTED]	Recent-Purchase	47 USC 227(b); 47 CFR 64.1200(a)
ORG	FOXTELECOM	Feb 09, 2023 13:47 UTC	Feb 14, 2023 18:04 UTC	[REDACTED]	[REDACTED]	Recent-Purchase	47 USC 227(b); 47 CFR 64.1200(a)
ORG	FOXTELECOM	Feb 09, 2023 20:53 UTC	Feb 14, 2023 18:06 UTC	[REDACTED]	[REDACTED]	Recent-Purchase	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Mak Telecom	Feb 09, 2023 13:42 UTC	Feb 12, 2023 16:10 UTC	[REDACTED]	[REDACTED]	Recent-Purchase	47 USC 227(b); 47 CFR 64.1200(a)
ORG	FOXTELECOM	Feb 09, 2023 14:38 UTC	Feb 14, 2023 18:06 UTC	[REDACTED]	[REDACTED]	Recent-Purchase	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Langworth Group	Feb 13, 2023 22:44 UTC	Feb 14, 2023 18:03 UTC	[REDACTED]	[REDACTED]	Payment-Approval	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Langworth Group	Feb 13, 2023 22:14 UTC	Feb 14, 2023 23:10 UTC	[REDACTED]	[REDACTED]	Recent-Purchase-P1	47 USC 227(b); 47 CFR 64.1200(a)
ORG	LOWELL TELCO	Feb 13, 2023 15:27 UTC	Feb 15, 2023 21:13 UTC	[REDACTED]	[REDACTED]	Payment-Approval-P1	47 USC 227(b); 47 CFR 64.1200(a)
ORG	LOWELL TELCO	Feb 14, 2023 19:36 UTC	Feb 15, 2023 21:06 UTC	[REDACTED]	[REDACTED]	Recent-Purchase-P2	47 USC 227(b); 47 CFR 64.1200(a)
ORG	LOWELL TELCO	Feb 14, 2023 14:35 UTC	Feb 15, 2023 20:52 UTC	[REDACTED]	[REDACTED]	Recent-Purchase-P2	47 USC 227(b); 47 CFR 64.1200(a)
ORG	LOWELL TELCO	Feb 13, 2023 20:45 UTC	Feb 16, 2023 18:40 UTC	[REDACTED]	[REDACTED]	Recent-Purchase-P2	47 USC 227(b); 47 CFR 64.1200(a)

⁶⁹ “ORG” denotes that the Company is the originator of the call.

Role	Customer	Call Date & Time	Date of ITG Notification	Calling No.	Called No.	Description	Violation
ORG	Zetel	Feb 15, 2023 23:00 UTC	Feb 16, 2023 18:40 UTC	[REDACTED]	[REDACTED]	Authorized-Order-P1	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Scott Telecom	Feb 16, 2023 17:17 UTC	Feb 18, 2023 00:59 UTC	[REDACTED]	[REDACTED]	Authorized-Order-P2	47 USC 227(b); 47 CFR 64.1200(a)
GP ⁷⁰	Mavtel Voip	Mar 01, 2023 22:21 UTC	Mar 03, 2023 20:52 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Mavtel Voip	Mar 01, 2023 21:15 UTC	Mar 03, 2023 17:27 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Mavtel Voip	Mar 01, 2023 16:16 UTC	Mar 03, 2023 20:43 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Mavtel Voip	Mar 01, 2023 15:31 UTC	Mar 03, 2023 18:31 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Mavtel Voip	Feb 28, 2023 19:56 UTC	Mar 03, 2023 20:43 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Mavtel Voip	Feb 28, 2023 14:41 UTC	Mar 06, 2023 13:43 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 06, 2023 20:45 UTC	Mar 08, 2023 14:31 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 06, 2023 19:40 UTC	Mar 08, 2023 00:40 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 06, 2023 19:30 UTC	Mar 08, 2023 00:41 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 06, 2023 14:57 UTC	Mar 08, 2023 17:28 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 08, 2023 20:10 UTC	Mar 13, 2023 13:45 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 08, 2023 17:43 UTC	Mar 13, 2023 15:19 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Mavtel Voip	Mar 08, 2023 15:16 UTC	Mar 16, 2023 04:08 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 09, 2023 20:33 UTC	Mar 13, 2023 15:19 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 09, 2023 19:04 UTC	Mar 10, 2023 21:55 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)

⁷⁰ “GP” denotes that the Company is the gateway provider for the call.

Role	Customer	Call Date & Time	Date of ITG Notification	Calling No.	Called No.	Description	Violation
GP	Clevertel	Mar 09, 2023 18:58 UTC	Mar 13, 2023 14:11 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Clevertel	Mar 09, 2023 17:45 UTC	Mar 13, 2023 13:50 UTC	[REDACTED]	[REDACTED]	Authorized-Order	47 USC 227(b); 47 CFR 64.1200(a)
GP	Mavtel Voip	Mar 13, 2023 13:59 UTC	Mar 16, 2023 04:07 UTC	[REDACTED]	[REDACTED]	Details-Sent	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Delta Telecom	Mar 20, 2023 15:38 UTC	Apr 18, 2023 20:49 UTC	[REDACTED]	[REDACTED]	Amazon-Impers-P2	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Delta Telecom	Apr 19, 2023 16:36 UTC	Apr 21, 2023 01:02 UTC	[REDACTED]	[REDACTED]	Amazon-AuthorizeOrder-P3	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Rogers Voice	Apr 26, 2023 15:27 UTC	May 03, 2023 01:35 UTC	[REDACTED]	[REDACTED]	GovtImpers	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Rogers Voice	May 02, 2023 21:12 UTC	May 04, 2023 15:43 UTC	[REDACTED]	[REDACTED]	Amazon-AuthorizeOrder-P3	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Rogers Voice	May 02, 2023 16:42 UTC	May 04, 2023 16:52 UTC	[REDACTED]	[REDACTED]	Amazon-AuthorizeOrder-P3	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Rogers Voice	May 02, 2023 14:53 UTC	May 04, 2023 15:40 UTC	[REDACTED]	[REDACTED]	Amazon-AuthorizeOrder-P3	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Rogers Voice	May 02, 2023 14:10 UTC	May 04, 2023 17:11 UTC	[REDACTED]	[REDACTED]	Amazon-AuthorizeOrder-P3	47 USC 227(b); 47 CFR 64.1200(a)
ORG	Rogers Voice	May 02, 2023 13:22 UTC	May 04, 2023 12:55 UTC	[REDACTED]	[REDACTED]	Amazon-AuthorizeOrder-P3	47 USC 227(b); 47 CFR 64.1200(a)
ORG	AllSeeingConnect LLC	May 31, 2023 14:04 UTC	May 31, 2023 20:10 UTC	[REDACTED]	[REDACTED]	Amazon-Various-P1	47 USC 227(b); 47 CFR 64.1200(a)