



# FEDERAL COMMUNICATIONS COMMISSION

Enforcement Bureau  
Telecommunications Consumers Division  
45 L Street, NE  
Washington, DC 20554

February 6, 2024

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

**To:** Lingo Telecom, LLC  
Alex Valencia  
Chief Compliance Officer  
9330 LBJ Freeway  
Suite 944  
Dallas, TX 75243  
alex.valencia@lingo.com

### **Re: Notice of Suspected Illegal Traffic**

Dear Mr. Valencia,

Lingo Telecom, LLC (Lingo or Company)<sup>1</sup> is apparently originating illegal robocall traffic. The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) provides this letter as notice of important legal obligations and steps Lingo must take to address this apparently illegal traffic. Failure to comply with the steps outlined in this letter **may result in downstream providers permanently blocking all of Lingo's traffic.**

#### **I. Background**

On Sunday, January 21, 2024—two days before the New Hampshire Presidential Primary Election—individuals began receiving calls that played an apparently deepfake<sup>2</sup> prerecorded message from a voice that was artificially created to sound like U.S. President Joseph R. Biden, Jr.<sup>3</sup> According to

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<sup>1</sup> The Company has also used the following names: Americatel, BullsEyeComm, Clear Choice Communications, Excel Telecommunications, Impact Telecom, Lingo, Lingo Communications, Matrix Business Technologies, Startec Global Communications, Trinsic Communications, and VarTec Telecom. Mich. Dept. of Licensing and Regulatory Affairs, Corps., Sec. & Commercial Licensing Bureau, Lingo Telecom, LLC Assumed Names, <https://cofs.lara.state.mi.us/CorpWeb/UA/UAAssumedNames.aspx?CID=6C3UB4&PageType=VIEW> (last visited Jan. 31, 2024). Matrix Telecom, LLC, changed its name to Lingo Telecom, LLC, effective on or around December 6, 2021. Mich. Dept. of Licensing and Regulatory Affairs, Corps., Sec. & Commercial Licensing Bureau, Lingo Telecom, LLC, <https://cofs.lara.state.mi.us/CorpWeb/CorpSearch/CorpSummary.aspx?token=nBxILn58HwVtv4JMRDwTm1cWblOpjnzIqg3FCQzRMH7Z0mRAdeXC1B8Va3CnnoIhDhcDYIqcZVi3dnJnNFadHcdniZEijQeGJopTfqFPI7xgod2qV9s3eFoRRs6vnbQ31YZ9JKvSoWIBcvAI/0WYMX15VFOuhH0/B2ptav4Vx+pXtHOIGguaG+65R+yK8NLn8H0peRsN54rS2E1h/UFsK0+93HMxX3O6dZnl15QDIzP43EspnSI2cr4bpHjiYIMa7Mr5LIWav3kL6ckNbA+9pHqU0SoLj66u+MAzDwFzFSMw1hQImJv1gZModh1MPjejGmFGt8T7tYaYm7BNolvy+KJDmSIHZzP7> (last visited Jan. 31, 2024) (Lingo Name Change).

<sup>2</sup> “Deepfake” is defined as “an image or recording that has been convincingly altered and manipulated to misrepresent someone as doing or saying something that was not actually done or said.” *Deepfake*, Merriam-Webster (last updated Feb. 24, 2024), <https://www.merriam-webster.com/dictionary/deepfake#dictionary-entry-1>.

<sup>3</sup> Numerous news outlets have concluded that the recorded voice resembled the voice of President Biden. *See, e.g.*, Alex Seitz-Wald and Mike Memoli, *Fake Joe Biden robocall tells New Hampshire Democrats not to vote Tuesday*, NBC News (Jan. 22, 2024, Updated 11:45 AM EST), <https://www.nbcnews.com/politics/2024-election/fake-joe-biden-robocall-tells-new-hampshire-democrats-not-vote-tuesday-rcna134984> (“The call, an apparent imitation or

news reports, the caller identification information indicated that the calls came from a phone number that appeared as though it belonged to the spouse of Kathy Sullivan (Sullivan), a former New Hampshire Democratic Party chair who is running a super Political Action Committee (PAC) that led an effort to have New Hampshire Democrats write in President Biden’s name in the state’s primary election.<sup>4</sup> The message advised potential Democratic voters to *refrain* from voting in the upcoming primary election:

This coming Tuesday is the New Hampshire Presidential Preference Primary. Republicans have been trying to push nonpartisan and democratic voters to participate in their primary. What a bunch of malarkey. We know the value of voting democratic when our votes count. It’s important that you save your vote for the November election. We’ll need your help in electing Democrats up and down the ticket. Voting this Tuesday only enables the Republicans in their quest to elect Donald Trump again. Your vote makes a difference in November, not this Tuesday. If you would like to be removed from future calls, please press two now. Call {{[REDACTED]}}<sup>5</sup> to be removed from future calls.<sup>6</sup>

The Bureau’s investigation, conducted in coordination with the New Hampshire Attorney General, the bipartisan Anti-Robocall Multistate Litigation Task Force (Task Force),<sup>7</sup> and USTelecom’s Industry Traceback Group (ITG),<sup>8</sup> revealed Lingo as the originating provider for these calls.<sup>9</sup> The ITG notified Lingo of these calls and provided the Company with supporting data identifying each call.<sup>10</sup> Lingo identified an entity named Life Corp. (Life) as the party initiating the calls.<sup>11</sup> Lingo did not contest

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digital manipulation of the president’s voice . . . .”); Jacob Rosen, *Fake Biden robocall encourages voters to skip New Hampshire Democratic primary*, CBS News (Jan. 23, 2024, 9:17 AM EST), <https://www.cbsnews.com/news/fake-biden-robocall-new-hampshire-primary/> (“A fake robocall impersonating President Biden . . . .”); Sasha Pezenik and Brittany Shepherd, *Fake Biden robocall urges New Hampshire voters to skip their primary*, ABC News (Jan. 22, 2024, 8:08 PM EST), <https://abcnews.go.com/Politics/fake-biden-robocall-urges-new-hampshire-voters-skip/story?id=106580926> (“A robocall appearing to impersonate the voice of President Joe Biden . . . .”); Em Steck and Andrew Kaczynski, *Fake Joe Biden robocall urges New Hampshire voters not to vote in Tuesday’s Democratic primary*, CNN (Jan. 22, 2024, Updated 5:44 PM EST), <https://www.cnn.com/2024/01/22/politics/fake-joe-biden-robocall/index.html> (“A robocall that appears to be an AI voice resembling President Joe Biden . . . .”).

<sup>4</sup> See Traceback Consortium Subpoena Response (Jan. 31, 2024) (on file at EB-TCD-24-00036094) (ITG Subpoena Response); see also Tiffany Hsu, *New Hampshire Officials to Investigate A.I. Robocalls Mimicking Biden*, N.Y. Times (Jan. 22, 2024), <https://www.nytimes.com/2024/01/22/business/media/biden-robocall-ai-new-hampshire.html> (“Ms. Sullivan said recipients of the unauthorized robocalls saw her husband’s name in their caller ID and were given her personal cellphone number to call to request removal from the call list.”).

<sup>5</sup> Material set off by double brackets {{ }} is confidential and is redacted from the public version of this document.

<sup>6</sup> See ITG Subpoena Response.

<sup>7</sup> The Anti-Robocall Multistate Litigation Task Force is a 51-member collective of state Attorneys General—led by the Attorneys General of Indiana, North Carolina, and Ohio—that is focused on actively investigating and pursuing enforcement actions against various entities in the robocall ecosystem that are identified as being responsible for significant volumes of illegal and fraudulent robocall traffic routed into and across the country.

<sup>8</sup> The ITG is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks. See 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 23-719, 2023 WL 5358422, at \*1, para. 1 (EB Aug. 18, 2023).

<sup>9</sup> ITG Subpoena Response, *supra* note 4; see also Attachment A (identifying the calls).

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

the illegality of the calls and purported to warn Life.<sup>12</sup> Artificial intelligence technology was apparently used to generate the artificial prerecorded voice message.<sup>13</sup> The caller also apparently “spoofed”<sup>14</sup> the calls to have a number associated with Sullivan displayed in the caller ID field.<sup>15</sup>

This is not the first time Lingo and Life have been subjects of an illegal robocall investigation. Since 2021, the ITG has identified Lingo as the gateway provider responsible for 61 suspected illegal calls originating overseas that entered the United States.<sup>16</sup> On August 21, 2022, the Task Force issued Lingo a Civil Investigative Demand to identify, investigate, and mitigate suspected illegal call traffic transmitting from its network.<sup>17</sup> On August 23, 2022, the Federal Trade Commission issued Matrix Telecom, LLC, which was Lingo’s prior corporate name, a Cease and Desist Demand that identified numerous illegal calls that the company was apparently transmitting.<sup>18</sup> On November 3, 2023, after observing that Lingo continued to transmit suspected illegal traffic, the Task Force further demanded that Lingo take steps to protect its network.<sup>19</sup> With regards to Life, more than two decades ago, in 2003, the FCC issued Life a citation for delivering apparently illegal prerecorded and unsolicited advertisements to residential lines.<sup>20</sup>

## II. Apparent Violations

Lingo had an obligation to protect its network from being used to originate illegal traffic, which it apparently failed to do.

### A. The Traffic was Apparently Illegal

It is unlawful to “knowingly transmit misleading or inaccurate caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value.”<sup>21</sup> Here, the caller apparently knowingly transmitted misleading and inaccurate caller identification information, in addition

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<sup>12</sup> *Id.*

<sup>13</sup> Pindrop, *Pindrop Reveals TTS Engine Behind Biden AI Robocall*, <https://www.pindrop.com/blog/pindrop-reveals-tts-engine-behind-biden-ai-robocall> (last visited Jan. 27, 2024) (concluding ElevenLabs Inc.’s text-to-speech engine generated the audio clip); see also *Watch: White House holds briefing amid reports of AI-generated robocalls impersonating Biden in New Hampshire*, PBS News Hour (Jan. 22, 2024, Updated 3:51 PM EST), <https://www.pbs.org/newshour/politics/watch-live-white-house-holds-daily-briefing-as-biden-and-harris-focus-on-reproductive-rights> (“White House press secretary Karine Jean-Pierre confirmed Monday that the call ‘was indeed fake and not recorded by the president.’”).

<sup>14</sup> “Spoofing is when a caller deliberately falsifies the information transmitted to your caller ID display to disguise their identity.” Fed. Comm’n Comm’n, *Caller ID Spoofing* (last updated Mar. 7, 2022), <https://www.fcc.gov/spoofing>.

<sup>15</sup> See ITG Subpoena Response, *supra* note 4; Tiffany Hsu, *New Hampshire Officials to Investigate A.I. Robocalls Mimicking Biden*, N.Y. Times (Jan. 22, 2024), <https://www.nytimes.com/2024/01/22/business/media/biden-robocall-ai-new-hampshire.html>.

<sup>16</sup> See ITG Portal, Lingo Hops Report (Jan. 28, 2024) (on file at EB- TCD-24-00036094).

<sup>17</sup> See Letter from Tracy Nayer, Special Deputy Attorney General, North Carolina Dept. of Justice, to Lingo Telecom, LLC (Nov. 3, 2023), <https://ncdoj.gov/wp-content/uploads/2023/11/State-AG-Task-Force-NOTICE-Letter-to-LINGO.pdf> (Task Force Letter).

<sup>18</sup> See Letter from Jon Miller Steiger, Regional Director, Bureau of Consumer Protection, Fed. Trade Comm’n, to Matrix Telecom, LLC (Aug. 23, 2022), [https://www.ftc.gov/system/files/ftc\\_gov/pdf/pointofnoentry-matrixtelecomdletter.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/pointofnoentry-matrixtelecomdletter.pdf); Lingo Name Change, *supra* note 1.

<sup>19</sup> See Task Force Letter.

<sup>20</sup> Citation from Kurt Schroeder, Deputy Chief, Enforcement Bureau, to Life Corporation (July 29, 2003).

<sup>21</sup> 47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a); *but see* 47 U.S.C. § 227(e)(3)(B)(ii) (exempting activities undertaken by U.S. law enforcement or pursuant to a court order); 47 CFR § 64.1604(b) (same).

to an apparently deepfake artificial prerecorded voice message. The caller chose to display in the caller identification field of the calls, a number that apparently was not assigned to them, a number with which they apparently had no existing connection or association, and which is presently assigned to another person.<sup>22</sup> The caller apparently intended to confuse the recipient of the call, create the false impression that the deepfake voice recording was from President Biden, which could wrongly give a prospective voter the impression that the president of the United States was telling them not to vote in the upcoming New Hampshire primary election. The caller apparently intended to cause harm to prospective voters when the deepfake voice message instructed the called parties to “save your vote for the November election,” attempting to discourage voters from exercising their constitutionally protected right to vote in the New Hampshire primary. The caller further instructed the called party to dial a number associated with Sullivan in order to be removed from “future calls,” thereby creating an added nuisance for Sullivan and frustrating the parties trying to return the call.<sup>23</sup> The caller’s deliberate and misleading use of the telephone number associated with a known New Hampshire Democrat further reinforces the caller’s apparently knowing and intentional attempt to deceive the recipient of the call. Accordingly, these calls were apparently illegal under section 64.1604(a) of the Commission’s rules.<sup>24</sup>

#### B. Lingo Apparently Originated the Illegal Traffic

The Commission’s rules obligate an originating provider to “[t]ake affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.”<sup>25</sup> A provider’s failure to protect its network can ultimately result in downstream providers blocking all of the provider’s traffic, permanently.<sup>26</sup> Despite these obligations, and numerous warnings as discussed above, Lingo apparently allowed these illegal calls to originate on its network.<sup>27</sup> Adding to the succession of misrepresentations and distortions in this call activity, Lingo signed these calls with an “A-Level Attestation”<sup>28</sup> – which signals to downstream providers in the call path that the signing provider has a direct authenticated relationship with the customer and the customer has the right to use the telephone number that appears in the caller ID field.<sup>29</sup> However, the number was assigned to someone other than Life, therefore Lingo should not have provided an “A-Level Attestation.”

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<sup>22</sup> See ITG Subpoena Response, *supra* note 4; U.S. Cellular Subpoena Response (Jan. 30, 2024) (on file at EB-TCD-24-00036094).

<sup>23</sup> See ITG Subpoena Response, *supra* note 4.

<sup>24</sup> 47 CFR § 64.1604(a).

<sup>25</sup> *Id.* § 64.1200(n)(4).

<sup>26</sup> See *id.* § 64.1200(n)(2)-(3).

<sup>27</sup> ITG Subpoena Response, *supra* note 4.

<sup>28</sup> *Id.*

<sup>29</sup> See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1863, para. 10 (2020) (*Second Caller ID Authentication Order*); see also ATIS & SIP Forum, Signature-based Handling of Asserted information using toKENs (SHAKEN) at 12 (2022), <https://www.sipforum.org/download/sip-forum-twg-10-signature-based-handling-of-asserted-information-using-tokens-shaken-pdf/?wpdmdl=2813&refresh=65c1499c3b6991707166108> (stating that, for A-level attestation, the “signing service provider is asserting that their customer can ‘legitimately’ use the [telephone number] that appears as the calling party (*i.e.*, the Caller ID).”).

### III. Potential Consequences

As a result of apparently originating illegal calls, Lingo potentially faces permissive blocking under section 64.1200(k)(4)<sup>30</sup> of the Commission's rules, mandatory blocking under section 64.1200(n),<sup>31</sup> and additional consequences under section 64.6305(g).<sup>32</sup>

#### A. Lingo Faces Permissive Blocking Under Section 64.1200(k)(4)

Under the safe harbor set forth in section 64.1200(k)(4) of the Commission's rules, any downstream provider (without any liability under the Communications Act of 1934, as amended, or the Commission's rules) may block all traffic from an upstream originating or intermediate provider that, when notified by the Commission, fails to either (a) effectively mitigate illegal traffic within 48 hours or (b) implement effective measures to prevent new and renewing customers from using its network to originate illegal calls.<sup>33</sup> Prior to initiating blocking, the downstream provider shall provide the Commission with notice and a brief summary of the basis for its determination that the originating or intermediate provider meets one or more of these two conditions for blocking.<sup>34</sup>

This letter provides notice to Lingo pursuant to section 64.1200(k)(4) that Lingo should effectively mitigate illegal traffic within 48 hours and implement effective measures to prevent new and renewing customers from using its network to originate illegal calls within 14 days of this letter in order to avoid having its traffic blocked by downstream providers.<sup>35</sup> Lingo should inform the Commission and the ITG within 48 hours of the email transmitting this letter of the specific steps it has taken to mitigate illegal traffic on its network.<sup>36</sup>

#### B. Lingo Faces Mandatory Blocking Under Section 64.1200(n)(2)

The Commission may order all immediately downstream providers to block all traffic from a directly upstream provider that does not comply with the obligations identified in section 64.1200(n)(2) of the Commission's rules.<sup>37</sup>

This letter serves as a Notice of Suspected Illegal Traffic (Notice) under section 64.1200(n)(2) of the Commission's rules.<sup>38</sup> Lingo must take the following actions in response to this Notice:

1. Promptly investigate the traffic identified in Attachment A for which the Company served as the originating provider;<sup>39</sup>
2. If the Company's investigation determines that the Company served as the originating or gateway provider for the identified traffic, block or cease accepting all of the identified

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<sup>30</sup> 47 CFR § 64.1200(k)(4).

<sup>31</sup> *Id.* § 64.1200(n).

<sup>32</sup> *Id.* § 64.6305(g).

<sup>33</sup> 47 CFR § 64.1200(k)(4).

<sup>34</sup> *Id.*

<sup>35</sup> *See id.*

<sup>36</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).

<sup>37</sup> 47 CFR § 64.1200(n)(3).

<sup>38</sup> *Id.* § 64.1200(n)(2).

<sup>39</sup> *Id.* § 64.1200(n)(2)(i)(A).

traffic within 14 days of date of this Notice and continue to block or cease accepting the identified traffic, as well as substantially similar traffic, on an ongoing basis;<sup>40</sup>

3. Report the results of the Company's investigation to the Bureau within 14 days of the date of this Notice.<sup>41</sup> Depending on the outcome of the investigation, the report must contain certain details as described below:
  - a. If Lingo determines it is the originating or gateway provider for the identified traffic and does not conclude the traffic is legal, the report must include (i) a certification that the Company is blocking the identified traffic and will continue to do so and (ii) a description of the Company's plan to identify and block or cease accepting substantially similar traffic on an ongoing basis;<sup>42</sup>
  - b. If Lingo determines that the identified traffic is not illegal, the report must provide (i) an explanation as to why the Company reasonably concluded that the identified traffic is not illegal and (ii) what steps it took to reach that conclusion;<sup>43</sup> and
  - c. If Lingo determines that it did not serve as the originating or gateway provider for any of the identified traffic, the report must (i) provide an explanation as to how the Company reached that conclusion and, (ii) if it is a non-gateway intermediate or terminating provider for the identified traffic, identify the upstream provider(s) from which the Company received the identified traffic and, if possible, take steps to mitigate the traffic.<sup>44</sup>

The Bureau may issue an Initial Determination Order stating the Bureau's initial determination that Lingo is not in compliance with section 64.1200 of the Commission's rules if: (a) the Company fails to respond to this Notice; (b) the Company provides an insufficient response; (c) the Company continues to originate substantially similar traffic or allow substantially similar traffic onto the U.S. network after the 14-day period identified above; or (d) the Bureau determines the traffic is illegal despite the Company's assertions to the contrary.<sup>45</sup> If the Bureau issues an Initial Determination Order, the Company will have an opportunity to respond.<sup>46</sup>

The Bureau may issue a Final Determination Order in EB Docket No. 22-174 concluding that Lingo is not in compliance with section 64.1200 of the Commission's rules and directing all downstream providers both to block and cease accepting all traffic from Lingo beginning 30 days from the release of the Final Determination Order if: (a) the Company does not provide an adequate response to the Initial Determination Order within the timeframe specified in the Initial Determination Order; or (b) the Company continues to originate or allow substantially similar traffic onto the U.S. network.<sup>47</sup> A Final

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<sup>40</sup> *See id.*

<sup>41</sup> *See id.*

<sup>42</sup> *See id.*

<sup>43</sup> *Id.* § 64.1200(n)(2)(i)(B).

<sup>44</sup> *Id.*

<sup>45</sup> *Id.* § 64.1200(n)(2)(ii).

<sup>46</sup> *Id.*

<sup>47</sup> *Id.* § 64.1200(n)(2)(iii), (3); *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59. FCC 23-37, at 14-15, para. 37 (2023).

Determination Order may be issued up to one year after the release date of the Initial Determination Order.<sup>48</sup>

C. Lingo Faces Removal from the Robocall Mitigation Database Under Section 64.6305(g)

Pursuant to section 64.6305(g) of the Commission's rules, intermediate and voice service providers shall only accept traffic from a domestic voice service provider or gateway provider if that provider's filing appears in the Robocall Mitigation Database (RMD).<sup>49</sup> If a company's filing is deficient in some way, the Bureau may initiate a proceeding to remove it.<sup>50</sup>

Lingo certified in its RMD filing, under penalty of perjury, that calls that it carries or processes are subject to a robocall mitigation program.<sup>51</sup> **Continued origination or transmission of illegal robocalls following this Notice may be used as evidence that Lingo's certification is deficient with respect to its robocall mitigation plan, and the Bureau may initiate proceedings to remove its filing from the database.**

Lingo certified in its RMD filing, under penalty of perjury, that it will cooperate with the FCC in investigating and stopping any illegal robocallers that use its service to carry or process calls.<sup>52</sup> **Failure to respond to this letter as described above may be used as evidence that Lingo's certification is deficient with respect to its commitment to cooperate, and the Bureau may initiate proceedings to remove its filing from the database.**

If Lingo's certification is removed from the RMD for any reason, all intermediate providers and terminating voice service providers must immediately cease accepting all of the Company's calls.<sup>53</sup> If the

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<sup>48</sup> 47 CFR § 64.1200(n)(2)(iii).

<sup>49</sup> *Id.* § 64.6305(g)(1), (3).

<sup>50</sup> See *Second Caller ID Authentication Order*, *supra* note 29, at 1904, para. 83 (noting that if a certification "is deficient in some way," the Commission may take enforcement action as appropriate, including "removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing"); *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, 37 FCC Rcd 6865, 6899, para. 80 (2022) (*Gateway Provider Order*) (noting that the rule applies to gateway providers as well as voice service providers); see also *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, 2023 WL 2582652, at \*11, para. 31 (Mar. 17, 2023) ("[A] provider's program is 'sufficient if it includes detailed practices that can reasonably be expected to significantly reduce' the carrying or processing (for intermediate providers) or origination (for voice service providers) of illegal robocalls. Each provider 'must comply with the practices' that its program requires, and its program is insufficient if the provider 'knowingly or through negligence' carries or processes calls (for intermediate providers) or originates (for voice service providers) unlawful robocall campaigns." (citations omitted)).

<sup>51</sup> Lingo Listing (No. RMD0004394), Fed. Comm'n's Comm'n, Robocall Mitigation Database (filed June 14, 2023), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=464896b91b4db4107ccf20ecac4bcbe1&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=464896b91b4db4107ccf20ecac4bcbe1&view=sp).

<sup>52</sup> *Id.*

<sup>53</sup> 47 CFR § 64.6305(g).



Bureau initiates a proceeding to remove the Company's certification from the Robocall Mitigation Database, Lingo will have an opportunity to respond.<sup>54</sup>

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Please direct any inquiries regarding this letter to Raul Rojo, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at [Raul.Rojo@fcc.gov](mailto:Raul.Rojo@fcc.gov) or (202) 418-1336; 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 ITG.

Sincerely,

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Loyaan A. Egal  
Bureau Chief  
Enforcement Bureau  
Federal Communications Commission

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<sup>54</sup> *Second Caller ID Authentication Order*, *supra* note 29, at 1903, para. 83; *Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40



**ATTACHMENT A**

<b>Customer</b>	<b>Call Date &amp; Time</b>	<b>Date of ITG Notification</b>	<b>Attestation</b>	<b>Calling No.</b>	<b>Called No.</b>	<b>Description</b>	<b>Violation</b>
Life Corporation	January 21, 2024 23:22 UTC	January 23, 2024 22:26 UTC	A	{[REDACTED]}	{[REDACTED]}	Political Impersonation	47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a)
Life Corporation	January 21, 2024 23:32 UTC	January 30, 2024 14:52 UTC	A	{[REDACTED]}	{[REDACTED]}	Political Impersonation	47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a)
Life Corporation	January 21, 2024 23:23 UTC	January 30, 2024 14:56 UTC	A	{[REDACTED]}	{[REDACTED]}	Political Impersonation	47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a)
Life Corporation	January 21, 2024 23:19 UTC	January 30, 2024 20:48 UTC	A	{[REDACTED]}	{[REDACTED]}	Political Impersonation	47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a)
Life Corporation	January 21, 2024 23:31 UTC	January 30, 2024 14:51 UTC	A	{[REDACTED]}	{[REDACTED]}	Political Impersonation	47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a)
Life Corporation	January 21, 2024 23:37 UTC	January 30, 2024 14:46 UTC	A	{[REDACTED]}	{[REDACTED]}	Political Impersonation	47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a)