



FEDERAL COMMUNICATIONS COMMISSION

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

May 20, 2024

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

**To:** Alliant Financial  
Mohammad Hossain  
Member, Management  
1016 W Jackson Blvd  
Chicago, IL 60607  
[alliantfinancial@proton.me](mailto:alliantfinancial@proton.me)

**Re: Notification of Suspected Illegal Traffic & Additional Notification of Robocall Mitigation Database Filing Deficiencies**

Dear Mohammad Hossain:

Alliant Financial (Alliant or Company)—an originating voice service provider that does not appear to offer financial services—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 Alliant 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 Alliant’s traffic**. The Bureau also provides this letter as additional notice to Alliant that its Robocall Mitigation Database (RMD) filing is deficient and outlines the steps Alliant must take to cure its deficiencies. Failure to cure such deficiencies **may result in Alliant’s removal from the RMD**.

**I. Background**

**A. Nature of the Identified Traffic**

USTelecom’s Industry Traceback Group (ITG)<sup>1</sup> conducted tracebacks on 13 calls, identified in Attachments A and B to this letter, placed to wireless numbers between November 10, 2023 and February 3, 2024.<sup>2</sup> The calls delivered prerecorded messages related to debt consolidation loans and claimed to be from “One Street Financial,” “Main Street Financial,” and “Alliant Financial.”<sup>3</sup> The use of the latter two names risks confusion for consumers because the names are similar to the names of entirely unrelated financial entities: (1) MainStreet Financial Services; and (2) Alliant Financial Solutions. Both companies

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<sup>1</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>2</sup> *See* ITG Subpoena Response (Dec. 11, 2023) (on file at EB-TCD-23-00035896) (December ITG Subpoena Response); ITG Subpoena Response (Mar. 7, 2024) (on file at EB-TCD-23-00035896) (March ITG Subpoena Response).

<sup>3</sup> *See* December ITG Subpoena Response; March ITG Subpoena Response.

have posted warnings on their websites that their names are being used by another party to make “spam type calls offering lending services.”<sup>4</sup>

The 13 tracebacks appear to be a subset of a vast and relentless campaign of “debt consolidation” calls.<sup>5</sup> Many consumers reported being contacted multiple times, which caused frustration and annoyance and hampered their ability to use their phones.<sup>6</sup> Consumers who returned calls from Alliant Financial, Main Street Financial, and One Street to request removal from the entities’ calling lists assert that they continued to receive an influx of calls despite these requests.<sup>7</sup>

Campaigns of this nature, however, are not only nuisances, they are often scams to obtain personal information or illegal upfront payments and often do not consolidate debt or otherwise improve the consumer’s financial situation.<sup>8</sup> Veterans and service members, in particular, are vulnerable to such campaigns because predatory lenders target them more frequently.<sup>9</sup> Falling prey to such scams can be destructive to Veterans and their families as “studies have confirmed a link between troubled financial status and poor physical and mental health in veterans.”<sup>10</sup> Financial stressors have similarly damaging

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<sup>4</sup> See Alliant Financial Solutions, <https://www.alliantfinancialsolutions.com/> (last visited Apr. 4, 2024) (screenshot on file at EB-TCD-23-00035896) (“Alliant Financial Solutions is aware that another company is using the name ‘Alliant Financial’ and making spam type calls offering lending services. Alliant Financial Solutions will never make unsolicited calls.”); MainStreet Financial Services, <https://www.mainstreetfinancialservices.com/> (last visited Apr. 2, 2024) (screenshot on file at EB-TCD-23-00035896) (“For those receiving multiple daily calls from a ‘Main Street Financial’ regarding debt consolidation from (855) area code number or other numbers. THIS IS NOT OUR FIRM.”).

<sup>5</sup> See *infra* pp. 3-4.

<sup>6</sup> See, e.g., FCC Complaint # 6598935 (Nov. 22, 2023) (on file at EB-TCD-23-00035896) (“Alliance [sic] Financial Bogus Company . . . . I am receiving multiple calls every day from different numbers with the message, ‘Alliant Financial our records indicate you have a pre-approval which is set to expire from one of our partners of up to 100,000 dollar personal loan to speak with a member of our team please press 2 to speak to . . .’ My voicemail is constantly full of their messages and others who I want to talk to are unable to leave me a message. How do I stop the calls?”); FCC Complaint # 6731862 (Jan. 29, 2024) (on file at EB-TCD-23-00035896) (“I have been receiving calls from ‘Brian at Main Street financial’ multiple times a day for months now. I block the number but they call back shortly after using a similar number. The calls come in 7 days a week from 7am until 9pm. Please help.”); FCC Complaint # 6736964 (Jan. 31, 2024) (on file at EB-TCD-23-00035896) (“Several times a day from several different numbers I get ‘Sarah’ from One Street Financial calling me about a debt consolidation loan that expires at the end of 2023. It WONT stop. I have blocked 20+ different [sic] numbers and each time they leave a message on the voice mail. I have enabled my cell phone carriers scam shield. Nothing helps.”).

<sup>7</sup> See, e.g., FCC Consumer Complaint #6576747 (Nov. 11, 2023) (“I have been getting calls from a company called ‘Alliant Financial’ . . . . I have tried to ask them multiple times to remove me from their call list and they just hang up the phone or act very rude.”); FCC Consumer Complaint #6664167 (Dec. 28, 2023) (Main Street financial. Call from multi [sic] numbers. Have asked to be removed multiple times over several months and calls continue . . . .”); FCC Consumer Complaint #6820086 (“One street financial calls me up to 10 times a day. It’s been going on for months. I have called and requested to be taken off their call list and they just will not remove me. I have blocked their number but then they call from a different number.”).

<sup>8</sup> See *How to Get Out of Debt*, Fed. Trade Comm’n, <https://consumer.ftc.gov/articles/how-get-out-debt#Credit%20Repair> (last visited Apr. 4, 2024) (discussing signs that a consumer is dealing with a debt settlement scam); Ana Staples, *How to avoid a debt settlement scam—and get the help you need*, CNBC (June 8, 2023), <https://www.cnbc.com/select/how-to-avoid-a-debt-settlement-scam/>; Emily Cahill, *Signs of Debt Settlement Scams to Watch For*, Experian (Mar. 8, 2023), <https://www.experian.com/blogs/ask-experian/signs-of-debt-settlement-scams/>; see also *What is a Debt Consolidation Loan? Does Debt Consolidation Hurt Your Credit?*, Equifax, <https://www.equifax.com/personal/education/debt-management/articles/-/learn/what-is-debt-consolidation/> (last visited Mar. 28, 2024).

<sup>9</sup> See Eric B. Elbogen et al., *Financial Status and Well-being in Recently Separated Military Veterans*, 188 Mil. Med. e2181, e2182 (2023), <https://academic.oup.com/milmed/article/188/7-8/e2181/6540063>.

<sup>10</sup> See *id.*

effects on active duty soldiers.<sup>11</sup> These types of calls pose a significant threat to the safety of the financial and personal identifying information of the public, and in particular, Veterans, active duty service members, and their families.

**B. Pre-Recorded Voice Calls from Alliant Financial, Main Street Financial and One Street**

Alliant:

YouMail, Inc. (YouMail)<sup>12</sup> estimates that in November 2023 approximately 16.1 million calls were placed to consumers playing prerecorded messages purporting to be from Alliant Financial.<sup>13</sup> The identified recordings advertise the commercial availability of a debt consolidation loan with one of Alliant Financial’s partners.<sup>14</sup> There are variations of these messages, one of which is set forth below:

This message is brought to you by Alliant Financial. Our records indicate that you have a preapproval which is set to expire from one of our partners of up to [sic] \$100,000 personal loan. To speak with a member of our team . . . .<sup>15</sup>

Main Street Financial:

YouMail estimates that between December 1, 2023 and January 31, 2024, approximately 13.5 million calls were placed to consumers playing prerecorded messages purporting to be from Main Street Financial.<sup>16</sup> The prerecorded message offers to qualify and enroll the consumer for a loan.<sup>17</sup> The recording attempts to influence consumers by noting the continued rise of interest rates and inflation.<sup>18</sup> This prerecorded message also created a sense of urgency by placing a deadline on the consumer’s chance to participate, requesting the consumer call back “as soon as possible,” and emphasizing that it is “really, really busy” at Main Street Financial:

Hello, this is Brian with Main Street Financial, phone number {[ ]}.<sup>19</sup> Uh, I see here your qualification for our debt consolidation loan is, uh, set to expire at the end of the year. Obviously a debt consolidation loan is a great opportunity to reduce those high interest debts, um, especially with inflation and interest rates continuing to rise. Um, I have a reference code for you. That is A as in apple, uh, 6495527. Um, a member of my team or myself are more than capable of helping you go through the steps of getting this loan. Uh, please give me a call back as soon as possible, as you can probably imagine, here during the holidays, it’s really, really busy. Uh, phone number’s {[ ]}. Again that’s {[ ]}. Um, if I’m busy and another member of

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<sup>11</sup> See *id.*

<sup>12</sup> YouMail is a third-party robocall identification and blocking service. See *About Us*, YouMail, <https://www.youmail.com/home/corp/about> (last visited Apr. 12, 2024).

<sup>13</sup> See *Daily Call Volume per Campaign*, YouMail, Inc., <https://app.sigmacomputing.com/youmailinc/workbook/> (last visited Mar. 19, 2024) (screenshot on file at EB-TCD-23-00035896) (illustrating an aggregate of approximately 16.1 million calls transcribed by YouMail with similar debt consolidation robocall messages).

<sup>14</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>15</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>16</sup> See *Daily Call Volume per Campaign*, YouMail, Inc., <https://app.sigmacomputing.com/youmailinc/workbook/> (last visited Mar. 19, 2024) (screenshot on file at EB-TCD-23-00035896).

<sup>17</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>18</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>19</sup> Material set off by double brackets {[ ]} is confidential and redacted from the public version of this document.

my team answers the phone, they'll be more than able to assist you in, uh, getting qualified and getting enrolled in the program. Ok, talk soon.<sup>20</sup>

One Street Financial:

YouMail estimates that between December 1, 2023 and February 29, 2024, approximately 48.7 million calls were placed to consumers playing prerecorded messages purporting to be from One Street Financial.<sup>21</sup> Following a similar script to the prior two campaigns, this recording advertised the commercial availability of a personal loan for the consumer:

Hi this is an important update from One Street Financial at {{ [REDACTED] }}, we sent you a mail offer because you or someone in your household – Hi, this is Sarah from One Street Financial. I'm calling to follow up on the letter we mailed to you. You've been preselected for our economic relief personal loan because of your current financial situation. This loan is ideal for consolidating high interest credit card and personal loan debt . . . .<sup>22</sup>

**C. The Company Apparently Originated the Identified Traffic**

The ITG investigated the calls described in Attachments A and B and determined that Alliant was the originating provider.<sup>23</sup> The ITG notified Alliant of these calls and provided the Company with supporting data identifying each call.<sup>24</sup> Alliant did not contest that it had originated the calls and identified one client as the source of all of the calls.<sup>25</sup> The Bureau was unable to reach Alliant at the physical address Alliant lists in the Commission's RMD,<sup>26</sup> and the Bureau's emails to the email address Alliant lists in the RMD remain unanswered.<sup>27</sup>

**II. Apparent Violations**

**A. The Identified Traffic Was Apparently Illegal**

Federal law and our rules protect consumers from certain types of calls.<sup>28</sup> Regardless of the content, calls to cellphones containing artificial or prerecorded voice messages are illegal absent an emergency purpose or prior express consent.<sup>29</sup> Further, artificial or prerecorded voice message calls to

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<sup>20</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>21</sup> See *Daily Call Volume per Campaign*, YouMail, Inc., <https://app.sigmacomputing.com/youmailinc/workbook/> (last visited Mar. 19, 2024) (screenshot on file at EB-TCD-23-00035896).

<sup>22</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>23</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>24</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>25</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>26</sup> See Affidavit of Attempted Service of {{ [REDACTED] }}, Director of Operations, United Processing, Inc., (Mar. 18, 2024) (on file at EB-TCD-23-00035896).

<sup>27</sup> See Email from Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau, to Mohammad Hossain, Member/Management, Alliant Financial (Mar. 11, 2024) (on file at EB-TCD-23-00035896); *see also* Email from Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau, to Mohammad Hossain, Member/Management, Alliant Financial (Mar. 12, 2024) (on file at EB-TCD-23-00035896). The Bureau did not receive a response to either email.

<sup>28</sup> See generally 47 U.S.C. § 227; 47 CFR § 64.1200.

<sup>29</sup> 47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).

cellphones that introduce an advertisement or constitute telemarketing<sup>30</sup> are illegal absent prior express written consent or an emergency purpose.<sup>31</sup> As described above, the calls identified in Attachments A and B all featured prerecorded messages to wireless numbers and contained advertisements.<sup>32</sup> Thus, the prior express written consent of the called party was required.<sup>33</sup>

Alliant failed to provide sufficient evidence of consent for any of the calls identified in Attachments A and B. For the six calls identified in Attachment A, Alliant claimed that its customer who initiated the calls had prior consent, which it purportedly obtained through opt-in webpages.<sup>34</sup> Despite this claim, Alliant provided no evidence of such prior express written consent for the identified calls.<sup>35</sup> For the remaining seven calls identified in Attachment B, Alliant provided videos of online consent forms supposedly being filled out by consumers with their names and numbers.<sup>36</sup> The numbers in these forms, however, were assigned to Verizon's *internal* collection of wireless numbers, *i.e.*, they were not assigned to any subscriber.<sup>37</sup> As such, no subscriber could have consented to have those numbers called.<sup>38</sup> Accordingly, these calls were apparently illegal and Alliant is responsible for allowing these apparently unlawful calls to originate on its network.

Additionally, the Bureau also found no evidence that there was an emergency purpose for the calls identified in Attachments A and B.<sup>39</sup> The Bureau also found no evidence suggesting the calls identified in Attachments A and B were subject to exemptions described in section 64.1200(a)(9) of the Commission's rules.<sup>40</sup>

#### **B. The Company Apparently Failed to Protect Its Network**

An originating provider has an ongoing obligation to take affirmative, effective measures to prevent new and renewing customers from using its networks to originate illegal calls, including by knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.<sup>41</sup> Despite this obligation, Alliant allowed these apparently illegal calls to originate on its

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<sup>30</sup> See 47 CFR § 64.1200(f)(1) (“The term ‘advertisement’ means any material advertising the commercial availability or quality of any property, goods, or services.”); *id.* § 64.1200(f)(13) (“The term ‘telemarketing’ means the initiation of a telephone call or message for the purpose of encouraging the purchase or rental of, or investment in, property, goods, or services, which is transmitted to any person.”).

<sup>31</sup> *Id.* § 64.1200(a)(2).

<sup>32</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>33</sup> 47 CFR § 64.1200(a)(2).

<sup>34</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>35</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>36</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>37</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2; see also *Verizon Works with Wireless Carriers in US to Combat Robocalls*, Verizon News Center, <https://www.verizon.com/about/news/verizon-carriers-combat-robocalls> (last visited Apr. 12, 2024) (describing “honeypots”).

<sup>38</sup> Further, with regards to one of the videos purporting to show consent, the inputted number does not match the number called. See December ITG Subpoena Response, *supra* note 2. The consent form supplied showed an inputted number of {[ ]} while the called number was {[ ]}. *Id.*

<sup>39</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>40</sup> See 47 CFR § 64.1200(a)(9) (establishing exemptions from liability for entities placing calls regarding certain package delivery calls, certain inmate collect call billing calls, certain calls made by financial institutions, and certain calls made for healthcare purposes); see also December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>41</sup> 47 CFR § 64.1200(n)(4).

network.<sup>42</sup> A provider's failure to address adequately suspected illegal traffic on its network can ultimately result in downstream providers permanently blocking all of the provider's traffic.<sup>43</sup>

### III. Potential Consequences

As a result of apparently originating illegal calls, the Company potentially faces permissive blocking under section 64.1200(k)(4)<sup>44</sup> of the Commission's rules, mandatory blocking under section 64.1200(n)(3)<sup>45</sup> of the Commission's rules, and additional consequences under section 64.6305(g)<sup>46</sup> of the Commission's rules.

#### A. The Company 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 may (without any liability under the Communications Act of 1934, as amended, or the Commission's rules) 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>47</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>48</sup>

This letter provides notice, pursuant to section 64.1200(k)(4), that Alliant 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>49</sup> The Company should inform the Commission and the ITG, within 48 hours of the date of this letter, of the specific steps it has taken to mitigate illegal traffic on its network.<sup>50</sup>

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

The Commission may order all providers that are immediately downstream to block all traffic from an upstream provider that does not comply with the obligations identified in section 64.1200(n)(2) of the Commission's rules.<sup>51</sup>

This letter serves as a Notification of Suspected Illegal Traffic (Notice) under section 64.1200(n)(2) of the Commission's rules.<sup>52</sup> The Company must take the following actions in response to this Notice:

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<sup>42</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

<sup>43</sup> See 47 CFR § 64.1200(n)(2)-(3).

<sup>44</sup> *Id.* § 64.1200(k)(4).

<sup>45</sup> *Id.* § 64.1200(n)(3).

<sup>46</sup> *Id.* § 64.6305(g).

<sup>47</sup> *Id.* § 64.1200(k)(4).

<sup>48</sup> *Id.*

<sup>49</sup> See *id.*

<sup>50</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>51</sup> 47 CFR § 64.1200(n)(3).

<sup>52</sup> *Id.* § 64.1200(n)(2).

1. Promptly investigate the traffic identified in Attachments A and B for which the Company served as the originating provider;<sup>53</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 traffic within 14 days of the 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>54</sup> and
3. Report the results of the Company's investigation to the Bureau within 14 days of the date of this Notice.<sup>55</sup>

Depending on the outcome of the investigation, the report must contain certain details as described below:<sup>56</sup>

1. If the Company 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>57</sup>
2. If the Company 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>58</sup> and
3. If the Company 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>59</sup>

#### **1. Initial Determination Order**

The Bureau may issue an Initial Determination Order stating the Bureau's initial determination that Alliant 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>60</sup> If the Bureau issues an Initial Determination Order, the Company will have an opportunity to respond.<sup>61</sup>

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<sup>53</sup> *Id.* § 64.1200(n)(2)(i)(A).

<sup>54</sup> *See id.*

<sup>55</sup> *See id.*

<sup>56</sup> *Id.*

<sup>57</sup> *See id.*

<sup>58</sup> *Id.* § 64.1200(n)(2)(i)(B).

<sup>59</sup> *Id.*

<sup>60</sup> *Id.* § 64.1200(n)(2)(ii).

<sup>61</sup> *Id.*

## 2. Final Determination Order

The Bureau may issue a Final Determination Order in EB Docket No. 22-174 concluding that the Company 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 Alliant 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>62</sup> A Final Determination Order may be issued up to one year after the release date of the Initial Determination Order.<sup>63</sup>

### C. The Company Faces Removal from the RMD and Mandatory Blocking Under Section 64.6305(g)

This letter serves as notification to Alliant of additional deficiencies, or apparent deficiencies, in its RMD filing and outlines the steps Alliant must take to cure the deficiencies. Failure to cure all deficiencies in Alliant's RMD filing may result in its removal from the RMD. 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 RMD.<sup>64</sup> Such filings must include the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program.<sup>65</sup> If a company's filing is deficient in some way, the Bureau may initiate a proceeding to remove it.<sup>66</sup>

To remove a provider, the Commission first contacts the provider, notifying it that its filing is deficient, explaining the nature of the deficiency, and providing 14 days for the provider to cure the deficiency.<sup>67</sup> If the provider fails to cure, the Bureau releases an order concluding that a provider's filing

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<sup>62</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, 2023 WL 3686042, at \*11, para. 37 (May 19, 2023).

<sup>63</sup> 47 CFR § 64.1200(n)(2)(iii).

<sup>64</sup> *Id.* § 64.6305(g)(1), (3). This requirement also extends to accepting traffic from foreign providers using "North American Number plan resources that pertain to the United States in the caller ID field to send voice traffic." *Id.* § 64.6305(g)(2).

<sup>65</sup> *Id.* § 64.6305(d)(2)(ii), (f)(2)(ii).

<sup>66</sup> *See Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1903, para. 83 (2020) (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, 6882, para. 40 (2022) (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)); 47 CFR § 0.111(a)(28)(i).

<sup>67</sup> *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, 2604, para. 60 (2023) (*Sixth Caller ID Authentication Order*).



is deficient based on the available evidence and directing the provider to explain, within 14 days, ‘why the Enforcement Bureau should not remove the Company’s certification from the Robocall Mitigation Database’ and giving the provider a further opportunity to cure the deficiencies in its filing[.]”<sup>68</sup> If the provider fails to rectify the deficiency or provide a sufficient explanation why its filing is not deficient within that 14-day period, the Commission releases an order removing the provider from the RMD.<sup>69</sup>

On March 29, 2024, Alliant received an email notification regarding deficiencies in its filing from the Commission’s Wireline Communications Bureau due to the Company’s failure to update its RMD filing with all newly required information and certifications by February 26, 2024.<sup>70</sup> This letter serves as notice that Alliant’s filing is deficient, or may be deficient, for the additional reasons stated below.<sup>71</sup>

### **1. Origination of Illegal Robocalls**

Alliant certified in its RMD filing, under penalty of perjury, that calls that it carries or processes are subject to a robocall mitigation program.<sup>72</sup> Continued origination of illegal robocalls may be used as evidence that Alliant’s RMD certification is deficient with respect to its robocall mitigation plan.

### **2. Invalid Contact Information**

At least some of Alliant’s contact information in the RMD appears to be inaccurate.<sup>73</sup> Alliant apparently does not maintain business operations at the physical location listed in its filing (1016 W Jackson Blvd, Chicago, IL 60607).<sup>74</sup> We direct Alliant to update its RMD filing to include the correct contact information within 14 days of the date of this letter.<sup>75</sup>

### **3. Failure to Respond to Tracebacks**

Alliant certified in its RMD filing, under penalty of perjury, that it will cooperate with the FCC and the ITG in investigating and stopping any illegal robocallers that use its service to carry or process calls.<sup>76</sup> Between November 20, 2023 and February 16, 2023, Alliant failed to respond to traceback requests from the ITG for the seven calls listed in Attachment C to this letter.<sup>77</sup> To cure this deficiency, Alliant must respond fully to the seven traceback requests listed in Attachment C within 14 days of the

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<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> See Email from RMD-Compliance, FCC Wireline Competition Bureau, to Mohammad Hossain, Member/Management, Alliant Financial (Mar. 29, 2024) (on file at EB-TCD-23-00035896); see also Public Notice, *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, DA 24-73, at 2 (WCB Jan. 25, 2024) (notifying existing filers to update their RMD filings by February 26, 2024).

<sup>71</sup> *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

<sup>72</sup> See Alliant Financial Listing (No. RMD0015493), Fed. Comm’n’s Comm’n, Robocall Mitigation Database (filed Nov. 1, 2023), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=6ddace348712b150ab3765b70cbb3587&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=6ddace348712b150ab3765b70cbb3587&view=sp) (Alliant Financial Listing).

<sup>73</sup> See *id.*

<sup>74</sup> See Affidavit of Attempted Service of {{ }}, Director of Operations, United Processing, Inc., (Mar. 18, 2024).

<sup>75</sup> See *Sixth Caller ID Authentication Order*, *supra* note 67, at 2604, para. 60. We note that voice service providers are required to update their RMD filings within 10 business days of any change to the information in the filing. See 47 CFR § 64.6305(d)(5) (requiring a voice service provider to “update its filings within 10 business days of any change to the information it must provide pursuant to [section 64.6305(d)(1)-(4)].”).

<sup>76</sup> See Alliant Financial Listing.

<sup>77</sup> See December ITG Subpoena Response, *supra* note 2; March ITG Subpoena Response, *supra* note 2.

date of this letter. Furthermore, Alliant must thereafter respond fully and in a timely manner to any future traceback requests within 24 hours of the request in accordance with section 64.1200(n)(1) of the Commission's rules.<sup>78</sup>

If Alliant fails to cure the deficiencies set forth above, the Bureau may release an order concluding that the Company's filing is deficient and directing it to explain, within 14 days, why the Company's certification should not be removed from the RMD.<sup>79</sup> If Alliant does not adequately respond to that order, the Enforcement Bureau may subsequently release an order removing Alliant from the RMD.<sup>80</sup>

As noted above, if Alliant'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>81</sup>

\* \* \*

Please direct any inquiries regarding this letter to Raul Rojo, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau at [raul.rojo@fcc.gov](mailto:raul.rojo@fcc.gov) and Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, at [caitlin.barbas@fcc.gov](mailto:caitlin.barbas@fcc.gov) 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  
Chief  
Enforcement Bureau  
Federal Communications Commission

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<sup>78</sup> 47 CFR § 64.1200(n)(1). A voice service providers is required to respond within 24 hours regardless of whether the provider certified to do so in its RMD filing. *See id.*

<sup>79</sup> *See Sixth Caller ID Authentication Order*, *supra* note 67, at 2604, para. 60.

<sup>80</sup> *See id.*

<sup>81</sup> *See* 47 CFR § 64.6305(g).

**ATTACHMENT A (No Consent Provided)**

<b>Role</b>	<b>Customer</b>	<b>Call Date &amp; Time</b>	<b>Calling No.</b>	<b>Called No.</b>	<b>Description</b>	<b>Violation</b>	<b>Additional Details</b>
ORG	Alliant Financial	Feb 01, 2024 00:39 UTC	{[ ]}	{[ ]}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Provided
ORG	Alliant Financial	Jan 31, 2024 22:34 UTC	{[ ]}	{[ ]}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Provided
ORG	Alliant Financial	Jan 31, 2024 21:03 UTC	{[ ]}	{[ ]}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Provided
ORG	Alliant Financial	Jan 31, 2024 20:24 UTC	{[ ]}	{[ ]}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Provided
ORG	Alliant Financial	Jan 31, 2024 17:46 UTC	{[ ]}	{[ ]}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Provided
ORG	Alliant Financial	Jan 30, 2024 22:35 UTC	{[ ]}	{[ ]}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Provided

**ATTACHMENT B (Consent Not Sufficient)**

ORG	Alliant Financial	Feb 03, 2024 18:41 UTC	{	}	{	}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Sufficient
ORG	Alliant Financial	Feb 03, 2024 16:51 UTC	{	}	{	}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Sufficient
ORG	Alliant Financial	Feb 02, 2024 19:37 UTC	{	}	{	}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Sufficient
ORG	Alliant Financial	Feb 02, 2024 18:12 UTC	{	}	{	}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Sufficient
ORG	Alliant Financial	Feb 02, 2024 16:32 UTC	{	}	{	}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Sufficient
ORG	Alliant Financial	Nov 22, 2023 23:26 UTC	{	}	{	}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Sufficient
ORG	Alliant Financial	Nov 10, 2023 20:34 UTC	{	}	{	}	Debt Consolidation	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)	Consent Not Sufficient

**ATTACHMENT C (Non-Responsive)**

<b>Traceback Status</b>	<b>Non-Responsive Provider</b>	<b>Call Date &amp; Time</b>	<b>Calling No.</b>	<b>Called No.</b>
Non-Responsive	Alliant Financial	Nov 10, 2023 21:15 UTC	{  }	{  }
Non-Responsive	Alliant Financial	Nov 10, 2023 21:26 UTC	{  }	{  }
Non-Responsive	Alliant Financial	Jan 30, 2024 23:59 UTC	{  }	{  }
Non-Responsive	Alliant Financial	Feb 01, 2024 01:07 UTC	{  }	{  }
Non-Responsive	Alliant Financial	Feb 01, 2024 19:08 UTC	{  }	{  }
Non-Responsive	Alliant Financial	Feb 05, 2024 21:04 UTC	{  }	{  }
Non-Responsive	Alliant Financial	Feb 06, 2024 20:07 UTC	{  }	{  }