STATEMENT OF
COMMISSIONER ANNA M. GOMEZ

Re: In the Matter of Lingo Telecom, LLC, File No.: EB-TCD-24-00036425, Notice of Apparent
Liability for Forfeiture (May 23, 2024)

Today, the Commission adopted a Notice of Apparent Liability for Forfeiture to address an action
that harmed consumers.

We find that Lingo Telecom, LLC, apparently applied incorrect Secure Telephone Identity
Revisited and Signature-based Handling of Asserted Information using toKENs (STIR/SHAKEN)
attestations to spoofed robocalls. Steve Kramer apparently acted with the intent to defraud New
Hampshire voters by sending thousands of spoofed robocalls containing a message, created with Artificial
Intelligence (AI), imitating President Biden’s voice and instructing listeners to refrain from voting in the
New Hampshire primary election. Through its apparently lax observation of STIR/SHAKEN and our
consumer protection requirements, Lingo permitted Kramer’s apparently fraudulent scheme to take place.

This is significant. Lingo apparently failed to adequately identify spoofed robocalls that harmed
New Hampshire voters. In February of this year, we adopted a Declaratory Ruling confirming that the
Telephone Consumer Protection Act’s prohibition on using “artificial or prerecorded voice” to make
robocalls includes AI technologies that generate human voices.

The action at issue today exemplifies AI technology being harnessed for harm. The
consequences for consumers and the threat to our democratic processes warrant a strong response. That is
why this proposed penalty is so important, as the Commission must do what is within our power to deter
scams manipulating AI to prey on consumers and to threaten our democratic processes.

Thank you for the Enforcement Bureau and all staff at the FCC that contributed to this proposed
enforcement action.