



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

April 2, 2026

VIA ELECTRONIC DELIVERY AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Digital Solutions Inc.
Richard Anderson
Chief Executive Officer
1050 Curtis Street
Denver, CO 80202
support@gdstelecom.net

Re: Notification of Suspected Illegal Traffic & Additional Notification of Robocall Mitigation Database Certification Deficiency

Dear Richard Anderson,

Digital Solutions Inc. (Digital Solutions or Company) is originating apparently 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 Digital Solutions 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 Digital Solutions' traffic**. The Bureau also provides this letter as additional notice to Digital Solutions that its Robocall Mitigation Database (RMD) filing is deficient and outlines the steps Digital Solutions must take to cure its deficiency. Failure to cure this deficiency may result in the removal of Digital Solutions' certification from the RMD, which would then require all downstream providers to cease accepting traffic directly from the Company.

I. Background

A. The Nature of the Identified Traffic

USTelecom's Industry Traceback Group (ITG)¹ traced the sources of 51 calls, identified in Attachment A, placed to wireless numbers between May 6, 2025 and July 8, 2025.² Many of the 51 identified calls told recipients that they were "prequalified" or "eligible" for financial relief programs.³ Specifically, 19 of the 51 identified calls purported to be from someone on the "loan processing team" and mentioned that the recipient's "application" had been "preapproved for up to 41,000 dollars with estimated monthly payments of around 610 dollars depending on the terms you select."⁴ The recipient was told to "press '2'" to "speak with someone from underwriting" to "finalize" the terms of the loan.⁵ An additional four calls stated that "we finally have an approval for you" and "to review your offer and select your terms, press 2 now."⁶ The remaining calls for which the ITG has an audio recording mention

¹ 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, 38 FCC Rcd 7561, 7561, para. 1 (2023).

² *See* ITG Subpoena Response (July 24, 2025) (on file at EB-TCD-25-00038998) (ITG July Response).

³ *Id.*

⁴ *See id.* (recording of robocall received on June 20, 2025, 21:32 UTC, traceback no. 28623).

⁵ *Id.*

⁶ *See id.* (recording of robocall received on May 6, 2025, 19:37 UTC, traceback no. 26573)

that the “new administration has introduced updated IRS relief programs,” and that the recipient is qualified for one of these programs that “could significantly reduce or even eliminate” their tax balance.⁷ With minor variations, those calls contained the following message:

Hi, this is a message from the Tax Resolution Unit regarding your file. Press 2 now to speak with your assigned case specialist. With current economic changes and growing financial pressure, the new administration has introduced updated IRS relief programs to help individuals and business owners address unresolved tax issues. Based on our review, you may now qualify for the IRS fresh start program, which could significantly reduce or even eliminate your tax balance. To review your options, press 2 now.⁸

The calls for the government impersonation programs, like the IRS relief program, had an estimated call volume of 48,400,000 from June 2025 to September 2025.⁹ Specific mention of government programs can make the calls appear legitimate and mislead consumers into providing their personal information. For instance, the IRS has warned consumers against companies that “appear to be the IRS or offer to help you settle tax debt through the Fresh Start program.”¹⁰ Some of the voice messages further create a sense of urgency for consumers by mentioning that this is a “time-sensitive” offer.¹¹

B. The Company Originated the Identified Traffic

The ITG investigated the calls identified in Attachment A and determined that Digital Solutions originated the apparently illegal robocalls.¹² The ITG notified Digital Solutions of these calls and provided the Company with supporting data identifying each call, explaining that the basis for the traceback was “[e]vidence of lack of consent for prerecorded message.”¹³ The traceback requests directed Digital Solution to investigate the suspected illegal traffic and “[i]f, in investigating the call, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations.”¹⁴ Digital Solutions confirmed that it had originated the calls listed in Attachment A and identified three customers as the sources of all of the calls.¹⁵

II. Apparent Violations

A. Suspected Illegal Traffic

It is unlawful to place calls to cellphones containing artificial or prerecorded voice messages absent an emergency purpose or prior express consent.¹⁶ Here, the identified calls in Attachment A all

⁷ See *id.* (recording of robocall received on Jul 05, 2025, 15:06 UTC, traceback no. 29173).

⁸ *Id.*

⁹ See Email from {[redacted]}, Senior Threat Analyst, YouMail, Inc. to Genesis Monserrate, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau (Nov. 17, 2025, 11:19 AM EDT). Material set off by double brackets {[redacted]} is confidential and redacted from the public version of this document.

¹⁰ See IRS, Get Help With Tax Debt, <https://www.irs.gov/payments/get-help-with-tax-debt> (last visited Sept. 30, 2025).

¹¹ See ITG July Response, *supra* note 2 (recording of robocall received on May 06, 2025, 17:34 UTC, traceback no. 29299).

¹² *Id.*

¹³ *Id.* (email to Digital Solutions dated June 13, 2025, relating to traceback no. 27995).

¹⁴ *Id.*

¹⁵ See *id.*

¹⁶ 47 U.S.C. § 227(b)(1)(A); 47 CFR § 64.1200(a)(1).

featured artificial or prerecorded voice messages and were placed to cell phones.¹⁷ The Company confirmed that it had originated the calls and asserted that their customers had consent for fifteen calls.¹⁸ The remaining 36 calls were apparently placed without valid consent. The Company informed the ITG that the customers' telephone lines had been removed or their services were restricted,¹⁹ while other calls were being investigated.²⁰

Despite the purported consent for all 15 calls, there is evidence to suggest that the calls were made without consent. *First*, the 15 calls are part of several financial-related campaigns that typically prompt consumers into providing personal information.²¹ *Second*, three consumers whose phone numbers are identified in Attachment A complained about receiving multiple financial-related calls originating from different numbers.²² The consumer complaints place into question the legitimacy of the financial-related campaign calls that Digital Solutions has originated. *Third*, in August 2025, Digital Solutions originated 11 financial-related campaign calls to wireless numbers that were not in use by any consumer.²³ For most of these calls, Digital Solutions identified the same customer that claimed to have consent for all 15 calls.²⁴ Accordingly, we find that the identified calls were apparently illegal.²⁵

B. RMD Certification Deficiencies

This letter serves as notification to Digital Solutions of apparent deficiencies in its RMD filing and outlines the steps Digital Solutions must take to cure the deficiencies. Failure to cure all deficiencies in Digital Solutions' RMD filing may result in its removal from the RMD. The Company has two deficiencies related to the truthfulness and accuracy of their certification: (1) the Company certified that it has fully implemented STIR/SHAKEN across its entire network, but its robocall mitigation plan indicates that it has not implemented STIR/SHAKEN on a portion of its network; and (2) the Company has certified that it authenticates the caller ID information for all Session Initiation Protocol (SIP) calls it originates on its network, but ITG traceback data indicates that it has not done so for at least some calls.

Voice service providers are required to fully implement the STIR/SHAKEN authentication framework in their Internet protocol networks unless they are subject to an extension or exemption under the Commission's rules.²⁶ A voice service provider with a STIR/SHAKEN obligation is required under section 64.6301 of the Commission's rules to authenticate and verify caller identification information for all calls it originates on its IP network, either by itself or through a third party.²⁷ In addition, a voice service provider must certify in the RMD as to whether it (i) has fully implemented the STIR/SHAKEN

¹⁷ ITG July Subpoena Response, *supra* note 2.

¹⁸ *Id.* (traceback nos. 26571-74; 28503-06; 28620-23; 29173; 29295; 29299).

¹⁹ *Id.* (traceback nos. 27225-227; 27994-98; 28130; 28132-35; 28264-69; 29294, 29296-98; 29300-29305).

²⁰ *Id.* (traceback nos. 28994, 28996-97, 29169-72).

²¹ *See generally* ITG July Subpoena Response, *supra* note 2.

²² Sentinel Complaint #187754340 (May 20, 2025) ("I receive these calls at least once a day"); Sentinel Complaint # 187755573 (May 20, 2025) ("I've received dozens of calls from this office or others, all recorded."); Sentinel Complaint # 187755612 (May 20, 2025) ("They also called twice in a row. They left a message. Once again, this call, was about the new IRS tax reduction program. A different number was used today than other times."); Sentinel Complaint # 187651315 (May 17, 2025) ("I am receiving these calls from multiple numbers daily."); Sentinel Complaint # 187627493 (May 16, 2025) ("I receive several calls a week from the "tax resolution unit" claiming they can lower my tax payments. I try blocking the numbers but they call again using different numbers").

²³ *See* ITG Subpoena Response (Nov. 17, 2025) (on file at EB-TCD-25-00038998) (ITG November Response).

²⁴ *See Id.* (traceback nos. 27225-227; 27994-98; 28130; 28132-35; 28264-69; 29294, 29296-98; 29300-29305).

²⁵ 47 U.S.C. § 227(b)(1)(A); 47 CFR § 64.1200(a)(1)-(2).

²⁶ 47 CFR § 64.6301(a).

²⁷ *Id.* § 64.6301(a)(2)(ii), (b).

authentication framework on its entire network and all calls it originates are compliant with section 64.6301, (ii) has implemented the STIR/SHAKEN authentication framework on a portion of its network and all calls it originates on that portion of its network are compliant with section 64.6301(a) and (b), or (iii) has not implemented the STIR/SHAKEN authentication framework on any portion of its network.²⁸ If the voice service provider certifies to less than full STIR/SHAKEN implementation, it must identify the type of extension(s) the provider is claiming under section 64.6304 and the basis for the extension(s), or explain why it is unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN.²⁹

III. Potential Consequences

As a result of originating apparently illegal calls, the Company potentially faces permissive blocking under section 64.1200(k)(4)³⁰ of the Commission's rules, mandatory blocking under section 64.1200(n)³¹ of the Commission's rules, and additional consequences under section 64.6305(g)³² 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.³³ 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.³⁴

This letter provides notice, pursuant to section 64.1200(k)(4), that Digital Solutions 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.³⁵ The Company should inform the Commission and the ITG, within 48 hours of the electronic delivery date of this letter, of the specific steps it has taken to mitigate illegal traffic on its network.³⁶

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.³⁷ This letter serves as a Notification of Suspected Illegal Traffic (Notice)

²⁸ *See id.* § 64.6305(d)(1)(i).

²⁹ *See id.* § 64.6305(d)(2)(i); 64.6304.

³⁰ 47 CFR § 64.1200(k)(4).

³¹ *Id.* § 64.1200(n).

³² *Id.* § 64.6305(g).

³³ *Id.* § 64.1200(k)(4).

³⁴ *Id.*

³⁵ *See id.*; *see also id.* § 64.1200(n)(2)(i)(A) (requiring a minimum of 14 days to comply with the notice).

³⁶ *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).

³⁷ 47 CFR § 64.1200(n)(3).

under section 64.1200(n)(2) of the Commission's rules.³⁸ The Company 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;³⁹
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 (unless the Company determines that the identified traffic is not illegal);⁴⁰
3. Report the results of the Company's investigation to the Bureau within 14 days of the date of this Notice.⁴¹

Depending on the outcome of the investigation, the report must contain certain details as described below:⁴²

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;⁴³
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;⁴⁴ 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.⁴⁵

1. Initial Determination Order

The Bureau may issue an initial determination order stating the Bureau's initial determination that Digital Solutions 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

³⁸ *Id.* § 64.1200(n)(2).

³⁹ *Id.* § 64.1200(n)(2)(i)(A).

⁴⁰ *See id.*

⁴¹ *See id.*

⁴² *Id.*

⁴³ *See id.*

⁴⁴ *Id.* § 64.1200(n)(2)(i)(B).

⁴⁵ *Id.*

despite the Company's assertions to the contrary.⁴⁶ If the Bureau issues an initial determination order, the Company will have an opportunity to respond.⁴⁷

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 Digital Solutions 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.⁴⁸ A final determination order may be issued up to one year after the release date of the initial determination order.⁴⁹

C. The Company Faces Removal from the RMD Under Section 64.6305

Digital Solutions certified in the RMD that it is a voice service provider and that "it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301."⁵⁰ However, the Company indicates in its mitigation plan that there are portions of its network that are non-IP, and that it has not implemented STIR/SHAKEN across those non-IP portions.⁵¹ The Company did not identify or claim an applicable extension of the STIR/SHAKEN implementation obligation in its RMD filing. In addition, from August 8, 2025 to August 15, 2025, Digital Solutions did not authenticate 13 calls that it originated despite having certified that all calls originating on its network are authenticated in compliance with section 64.6301.⁵²

This failure to authenticate all calls that it originates indicates that Digital Solutions' certification of "Complete STIR/SHAKEN Implementation" in the RMD is inaccurate, and thus its certification is deficient. To cure these deficiencies, we direct Digital Solutions to (a) provide an explanation for the discrepancy between the Company's RMD certification and statements in its mitigation plan regarding its level of STIR/SHAKEN implementation, and update its certification and mitigation plan accordingly; and (b) provide authentication information for the calls listed in Attachment B within 14 days from the date of this Order and explain why it did not provide authentication information for each of the 13 calls.

Finally, Digital Solutions certified in its RMD filing, under penalty of perjury, that it would cooperate with the FCC in investigating and stopping any illegal robocallers that use its service to carry or process calls.⁵³ **Failure to respond to this letter and to correct the noticed deficiencies with its RMD**

⁴⁶ *Id.* § 64.1200(n)(2)(ii).

⁴⁷ *Id.*

⁴⁸ *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, 38 FCC Rcd 5404, 5417-18, para. 37 (2023).

⁴⁹ 47 CFR § 64.1200(n)(2)(iii).

⁵⁰ Digital Solutions RMD Certification.

⁵¹ *Id.* (where the Company's RMD plan states, "[f]or non-IP network segments, DIGITAL SOLUTIONS INC. has adopted a Robocall Mitigation Program compliant with 47 CFR § 64.6305").

⁵² See ITG November Response, *supra* note 23; Verizon Subpoena Response (Jan. 22, 2026) (on file at EB-TCD-25-00038998) (showing the intermediate providers that signed each of the calls in Attachment B); Digital Solutions RMD Certification.

⁵³ See Digital Solutions RMD Certification; 47 CFR § 64.6305(d)(2)(iii).

certification may be used as evidence that the Company's certification is also deficient with respect to its commitment to cooperate with the Commission.⁵⁴ If the Company's certification is removed from the RMD for any reason, all intermediate providers and terminating voice service providers must cease accepting traffic directly from the Company.⁵⁵

Please direct any inquiries regarding this letter to Genesis Monserrate, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at Genesis.Monserrate@fcc.gov and cc: to Daniel Stepanicich, Division Chief, Telecommunications Consumers Division, Enforcement Bureau, FCC, at Daniel.Stepanicich@fcc.gov. A copy of this letter has been sent to the ITG.

Sincerely,

Patrick Webre
Chief
Enforcement Bureau
Federal Communications Commission

⁵⁴ See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1903, para. 83 (2020) (*Second Caller ID Authentication Order*) (stating that deficient RMD certifications include those where the Commission finds that the provider knowingly or negligently transmits illegal robocall campaigns).

⁵⁵ See 47 CFR § 64.6305(g).

ATTACHMENT A

Role	Call Date & Time	Calling No.	Called No.	Description	Suspected Violations
ORG ⁵⁶	Jul 08, 2025 21:11 UTC	{[]}	{[]}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 08, 2025 13:41 UTC	{[]}	{[]}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 08, 2025 16:01 UTC	{[]}	{[]}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 07, 2025 15:49 UTC	{[]}	{[]}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 07, 2025 15:38 UTC	{[]}	{[]}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 07, 2025 19:53 UTC	{[]}	{[]}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 08, 2025 23:41 UTC	{[]}	{[]}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 08, 2025 14:45 UTC	{[]}	{[]}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 08, 2025 14:28 UTC	{[]}	{[]}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)

⁵⁶ “ORG” denotes that the Company was identified as the originator of the call.

Role	Call Date & Time	Calling No.	Called No.	Description	Suspected Violations		
ORG	Jul 08, 2025 18:59 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 08, 2025 16:05 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 08, 2025 17:23 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 05, 2025 15:06 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 05, 2025 17:33 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 05, 2025 17:37 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 05, 2025 17:05 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jul 05, 2025 16:00 UTC	{{	}}	{{	}}	TaxDebt-ReduceOrEliminate-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 30, 2025 17:20 UTC	{{	}}	{{	}}	Loan-Approval-P5	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)

Role	Call Date & Time	Calling No.	Called No.	Description	Suspected Violations	
ORG	Jun 30, 2025 15:05 UTC	{{	}}	{{	}}	Loan-Approval-P5 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 30, 2025 23:00 UTC	{{	}}	{{	}}	Loan-Approval-P5 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 20, 2025 22:08 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 20, 2025 21:32 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 20, 2025 15:49 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 20, 2025 00:27 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 19, 2025 18:36 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 19, 2025 19:16 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 19, 2025 19:49 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 19, 2025 20:26 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 14, 2025 16:21 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 14, 2025 19:30 UTC	{{	}}	{{	}}	Loan-Preapproved-P2 47 U.S.C. § 227(b); 47 CFR § 64.1200(a)

Role	Call Date & Time	Calling No.	Called No.	Description	Suspected Violations		
ORG	Jun 14, 2025 16:19 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 14, 2025 15:59 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 14, 2025 16:09 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 14, 2025 16:59 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 11, 2025 15:53 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 07, 2025 15:58 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 03, 2025 18:26 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 09, 2025 15:36 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 10, 2025 15:59 UTC	{{	}}	{{	}}	Loan-Preapproved-P2	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 10, 2025 14:38 UTC	{{	}}	{{	}}	BackIncomeTax-Debt-P1	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 10, 2025 00:42 UTC	{{	}}	{{	}}	BackIncomeTax-Debt-P1	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 10, 2025 15:37 UTC	{{	}}	{{	}}	BackIncomeTax-Debt-P1	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)

Role	Call Date & Time	Calling No.	Called No.	Description	Suspected Violations		
ORG	Jun 10, 2025 15:25 UTC	{{	}}	{{	}}	BackIncomeTax-Debt-P1	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Jun 10, 2025 18:27 UTC	{{	}}	{{	}}	BackIncomeTax-Debt-P1	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	May 20, 2025 16:08 UTC	{{	}}	{{	}}	TaxRelief-Services-P10	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	May 20, 2025 17:25 UTC	{{	}}	{{	}}	TaxRelief-Services-P10	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	May 20, 2025 17:11 UTC	{{	}}	{{	}}	TaxRelief-Services-P10	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	May 06, 2025 17:34 UTC	{{	}}	{{	}}	Loan-Preapproved-P8	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	May 06, 2025 19:37 UTC	{{	}}	{{	}}	Loan-Preapproved-P8	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	May 06, 2025 18:51 UTC	{{	}}	{{	}}	Loan-Preapproved-P8	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	May 06, 2025 16:30 UTC	{{	}}	{{	}}	Loan-Preapproved-P8	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)

ATTACHMENT B

Role	Call Date & Time	Calling No.	Called No.	Description	Suspected Violations
ORG	Aug 12, 2025 00:29 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 12, 2025 14:29 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 12, 2025 00:27 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 12, 2025 00:10 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 12, 2025 14:54 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 12, 2025 14:07 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 12, 2025 01:09 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 12, 2025 00:21 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 11, 2025 21:43 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)
ORG	Aug 11, 2025 20:13 UTC	{[]}	{[]}	Loan-Offer	47 CFR § 64.6305(d)(1)(i)