



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

June 11, 2026

VIA ELECTRONIC DELIVERY AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Aspireistic Inc.
Christopher Anderson
Senior Manager
1031 US 90 W Ste 3 141
DeFuniak Springs, FL 32433
info@aspireistics.com

32 N Gould St.
Sheridan, WY 82801

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

Dear Christopher Anderson,

Aspireistic Inc. (Aspireistic or Company) is originating apparently illegal robocall traffic to a Public Safety Answering Point (PSAP) in Page County, Virginia¹ and to consumer wireless telephone numbers. PSAPs provide critical emergency services and any disruption presents a serious threat to public health and safety.² The Commission has made stopping unlawful robocalls its highest consumer protection priority in part to combat disruptive calls that tie up emergency medical communications and put lives at risk.³ The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) provides this letter as notice of important legal obligations and steps Aspireistic 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 Aspireistic's traffic**. The Bureau also provides this letter as additional notice to Aspireistic that its Robocall Mitigation Database (RMD) certification is deficient in several respects and outlines the steps Aspireistic must take to cure the deficiencies. Failure to cure these deficiencies may result in the removal of Aspireistic's certification from the RMD, which would then require all downstream providers to cease accepting traffic directly from the Company.

¹ See E-mail from Danielle Rhinehart, Director, Page County Emergency Communications Center, to Alexander Hobbs, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau (Nov. 18, 2025, 10:08 AM EDT) (Page County Complaint) (on file at EB-TCD-26-00040126).

² See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97, 20-67, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3264, para. 50 (2020).

³ FCC, *Call Blocking Tools Now Substantially Available to Consumers: Report on Call Blocking at 6*, para. 8 (2020), <https://docs.fcc.gov/public/attachments/DOC-365152A1.pdf>.

I. Background

A. The Nature of the Identified Traffic

USTelecom's Industry Traceback Group (ITG)⁴ traced the sources of 12 robocalls, identified in Attachment A, placed to an emergency telephone line⁵ and to wireless numbers between November 6, 2025 and January 26, 2026, without the prior express consent of the called parties.⁶ The ITG identified Aspireistic as the originating provider for the calls identified in Attachment A.⁷ Aspireistic is a voice service provider registered in Wyoming with a principal business address in Florida.⁸ However, despite these indicia of the Company's domestic presence and its certification in the RMD that it is a domestic voice service provider (and not a foreign voice service provider), the Company appears to conduct some of its operations from Pakistan.⁹

i. Robocalls to an Emergency Telephone Line

The Page County 911 center filed a complaint with the Commission reporting robocalls that were placed to their emergency lines.¹⁰ EB staff asked the ITG to run tracebacks on the reported calls. The ITG identified Aspireistic as the originating provider for two robocalls, listed in Attachment A, that were placed to a PSAP on November 18, 2025 without prior express consent.¹¹ Here, 911 operators received the robocalls containing non-emergency messages on their emergency lines.¹² Specifically, the robocalls reached the Page County Emergency Communications Center.¹³ Aspireistic identified a single customer

⁴ 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).

⁵ *See* 47 CFR 64.1200(a)(1)(i) ("No person or entity may (1) Except as provided in paragraph (a)(2) of this section, initiate any telephone call (other than a call made for emergency purposes or is made with the prior express consent of the called party) using an automatic telephone dialing system or an artificial or prerecorded voice; (i) [t]o any emergency telephone line, including any 911 line and any emergency line of a hospital, medical physician or service office, health care facility, poison control center, or fire protection or law enforcement agency.").

⁶ *See* ITG Subpoena Response, Traceback Report (Feb. 10, 2026) (on file at EB-TCD-26-00040126) (ITG Traceback Report).

⁷ *Id.*

⁸ Aspireistic Inc., Articles of Incorporation, Wyoming Secretary of State (July 27, 2021); Aspireistic Inc., 2025 Original Annual Report – 11808382, Wyoming Secretary of State (June 30, 2025) (showing the Company's principal address in Sheridan, WY), available at <https://wyobiz.wyo.gov/business/FilingDetails.aspx?eFNum=143094001232004200217108251199164073082082179049>; Aspireistic Inc. (No. RMD0029141), FCC, Robocall Mitigation Database (filed Feb. 23, 2026) (showing the Company's address in DeFuniak Springs, FL), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=bd09ed8c1b13e290b2252062f54bcb8f&view=sp. (Aspireistic RMD Certification)

⁹ *See* ITG Subpoena Response, Traceback Report (Feb. 10, 2026) (on file at EB-TCD-26-00040720) (showing companies' [] address) (ITG Third Report). (showing that Aspireistic's responses to tracebacks 34064, 34410, and 34673 were sent from []); *see also* Aspireistic Inc., Articles of Incorporation § VI, Wyoming Secretary of State (July 27, 2021) (listing an address in Pakistan for the Company's incorporator).

¹⁰ Page County Complaint, *supra* note 1.

¹¹ *See* ITG Traceback Report.

¹² Page County Complaint, *supra* note 1.

¹³ *Id.*

located in West Bengal, India that was responsible for the calls.¹⁴ After notification from the ITG, the Company informed the ITG that it had terminated the customer's account.¹⁵

ii. Medicare-Related Robocalls to Wireless Telephone Numbers

The ITG also identified Aspireistic as the originating provider for 10 Medicare-related prerecorded voice message calls¹⁶ that were made to wireless telephone numbers without the prior express consent of the called party.¹⁷ Some of the voice messages told recipients that they had "unclaimed reimbursements left from 2025 Medicare plans"¹⁸ or other unclaimed Medicare benefits.¹⁹ Some of the calls contained the following message, with minor variations:²⁰

Good morning, my name is Ashley. I am reaching out because Medicare just launched an inflation release package for Arkansas which offers extra cash for groceries, gas, and prescriptions. It's part of the annual enrollment for 2026. So, you do have Medicare Part A and B, right?

The voice messages gave the impression that the callers have authority to speak on behalf of Medicare. For instance, some call recordings played the voice of an individual claiming to be a "Medicare advisor,"²¹ while other messages told recipients that their "Medicare files show unclaimed reimbursements."²² These apparently illegal calls have reached many consumers that reported receiving the calls "daily,"²³ one consumer reporting that "[i]t begins in the morning and goes on all day."²⁴ Aspireistic identified two foreign-based customers responsible for all 10 calls, one located in Egypt and the other in India.²⁵ After notification from the ITG, the Company informed the ITG that it had terminated both customers' account.

B. The Company Originated the Identified Traffic

The ITG investigated the calls identified in Attachment A and determined that Aspireistic originated the apparently illegal robocalls.²⁶ The ITG notified Aspireistic of these calls and provided the Company with supporting data identifying each call, explaining that the two identified calls to emergency

¹⁴ See ITG Traceback Report, *supra* note 6 (traceback nos. 34333 and 34338).

¹⁵ See *id.*

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.* (traceback no. 35574, recording of robocall received on Jan. 26, 2026, 20:02 UTC).

¹⁹ *Id.* (traceback no. 35345, recording of robocall received on Jan. 14, 2026, 21:06 UTC).

²⁰ See, e.g., *id.* (traceback no. 34064, recording of robocall received on Nov. 6, 2025, 19:05 UTC).

²¹ *Id.* (traceback no. 35345, recording of robocall received on Jan. 14, 2026, 21:06 UTC).

²² *Id.* (traceback no. 35571, recording of robocall received on Jan. 26, 2026, 21:45 UTC).

²³ FTC Complaint #194388940 (Nov. 28, 2025) (on file at EB-TCD-26-00040126); FCC Complaint #8208676 (Nov. 13, 2025) (on file at EB-TCD-26-00040126) ("An upsurge in calls begin with a recording of 'Olivia' offering a Medicare inflation relief package. The call is forwarded to a 'Medicare specialist'--always a foreign-accented individual giving false names--often foreign-accented individuals operating in the background at a call center can be heard.").

²⁴ FTC Complaint #194386905 (Nov. 28, 2025) (on file at EB-TCD-26-00040126); FTC Complaint #194323699 (Nov. 26, 2025) (on file at EB-TCD-26-00040126) ("They call every day, despite countless efforts for them to stop and blocking their numbers. They call with different numbers each time. When I ask what the name of the company is, they won't tell me and hang up instead.").

²⁵ See ITG Traceback Report, *supra* note 6 (showing the customers for the 10 Medicare-related calls).

²⁶ *Id.*

telephone lines were “[p]rerecorded high-volume telemarketing calls causing harm to called parties, including hospitals and emergency lines by tying up phone lines and resources through the unwanted calls”;²⁷ and that the 10 Medicare-related calls were “[p]rerecorded or AI calls to recipients regarding Medicare services, updates, benefits or options available” and specifically noting “[e]vidence of lack of consent for prerecorded message – called party confirmation” as one of the bases for the traceback request.²⁸

The traceback requests directed Aspireistic 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.”²⁹ Aspireistic’s traceback responses identified the end user customer responsible for each of the identified calls, thus acknowledging Aspireistic’s role as the originating provider for all of the calls. Aspireistic identified three foreign-based customers as the sources of the identified calls.³⁰ Aspireistic informed the ITG that it had terminated the three customers’ accounts and did not contest that the customers lacked consent for the identified calls.³¹ However, traceback records show that Aspireistic continued to originate traffic from two of the customers after it had claimed to have terminated them.³²

In addition, Aspireistic routed the apparently illegal traffic downstream apparently related companies. Aspireistic routed the calls identified in Attachment A to three downstream providers: Callsto, INFINITYSIP, and Conveytel, LLC.³³ The evidence suggests that Aspireistic may be related to the three companies, particularly Callsto.³⁴ First, Aspireistic and Callsto have originated calls for the same two robocalling campaigns, *i.e.*, the non-emergency robocalls to the PSAP lines and the Medicare-related robocalls.³⁵ Second, Aspireistic and the three downstream providers listed above shared unique information from October 2025 to January 2026.³⁶ The four companies each also conducted some of their operations from Pakistan between November 6, 2025 and January 30, 2026.³⁷ Third, Aspireistic and

²⁷ *Id.* (e.g., traceback request no. 34338 sent to Aspireistic on Nov. 19, 2025).

²⁸ *Id.* (e.g., traceback request no. 35574 sent to Aspireistic on Jan. 28, 2026).

²⁹ *Id.*

³⁰ *See id.* (identifying the three customers as Raso Infotech Pvt Ltd, based in West Bengal, India, HighSky Infotech, based in Uttar Pradesh, India, and Central Tact, based in Cairo, Egypt).

³¹ *See id.*

³² *See id.* In responding to traceback no. 34063, Aspireistic informed the ITG on November 10, 2025 that it had terminated the customer who had made that Medicare-related robocall (HighSky Infotech), but subsequent tracebacks show that Aspireistic originated robocalls in that same campaign for HighSky Infotech on November 20, December 1, and December 4, 2025. *See id.* (traceback nos. 34063, 34410, 34595, and 34673). A similar pattern exists with regard to another customer, Central Tact. *See id.* (traceback nos. 35345, 35571, and 35574).

³³ *See id.*

³⁴ *See* Letter from Patrick Webre, Chief, FCC Enforcement Bureau, to Henry A. Sickler, Vice President, Callsto LLC, (June 11, 2026) at 3-4 (on file in EB-TCD-26-00040126) (Callsto CDL). We note that, on December 10, 2024, the Commission issued a show cause order to 2,411 providers, including *Callsto*, for failure to cure deficiencies with their RMD certifications. *See 2,411 Robocall Mitigation Database Filers*, Order, 39 FCC Rcd 13318, 13318, para. 1 (EB 2024) (*Show Cause Order*).

³⁵ *See id.* Attachment A (showing that Callsto also originated calls for robocall campaigns identified by the ITG as “Medicare-Calls-P3” and “Annoyance-Calls-P5”).

³⁶ *See* ITG Subpoena Response, Traceback Report (Feb. 10, 2026) (on file at EB-TCD-26-00040720) (ITG Second Report).

³⁷ *See id.* (showing that Aspireistic and the three downstream providers shared identifiable information and located in Pakistan during this period).

Callsto submitted almost identical robocall mitigation plans to the RMD, which further suggests a relationship between the companies.³⁸ Exposing companies that collaborate with each other to facilitate illegal robocalls can alert industry to potential bad actors—including bad actor calling parties and the originating or gateway providers that transmit their traffic.

II. Apparent Violations

A. Suspected Illegal Traffic

It is unlawful to place calls to cellphones using artificial or prerecorded voice messages absent an emergency purpose or prior express consent.³⁹ Here, two of the identified calls in Attachment A used artificial or prerecorded voice messages and were placed to emergency telephone lines without the consent of the PSAP.⁴⁰ ITG tracebacks identified Aspireistic as the originating provider for both calls.⁴¹ Additionally, the ITG identified the calls as “high-volume telemarketing calls causing harm to called parties, including hospitals and emergency lines.”⁴² Therefore, the robocalls were made without an emergency purpose and there was no prior express consent because the PSAP did not consent to receive telemarketing robocalls.

The remaining 10 calls identified in Attachment A used artificial or prerecord voice messages related to Medicare and were placed to cell phones without the prior express consent of the called parties.⁴³ ITG tracebacks identified Aspireistic as the originating provider for each of the calls.⁴⁴ Additionally, the record shows that the calls were placed without prior express consent. First, all of the calls were made to wireless numbers that are not assigned to any end user customer.⁴⁵ Accordingly, there was no end user customer to provide consent for calls to these numbers. Second, the Company terminated service to all three customers upon receiving the traceback requests and did not contest that the customers lacked consent for the identified calls.⁴⁶ Third, the content of the prerecorded voice messages makes clear that the calls were not made for emergency purposes.⁴⁷ Accordingly, we find that the identified calls in Attachment A were apparently illegal.⁴⁸

³⁸ Aspireistic RMD Certification (showing the Company’s RMD plan); Callsto (No. RMD0012703), Fed. Commc’ns Comm’n, Robocall Mitigation Database (filed Feb. 20, 2026), [Robocall Mitigation Database Form - Robocall Mitigation Database](#) (Callsto RMD Certification) (on file at EB-TCD-26-00040126).

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

⁴⁰ ITG Traceback Report, *supra* note 6.

⁴¹ *See id.* (where Aspireistic identified itself as the originating provider for all calls identified in Attachment A).

⁴² *Id.* (traceback request no. 34338 sent to Aspireistic on Nov. 19, 2025, 16:48 UTC).

⁴³ *Id.*

⁴⁴ *Id.* (where Aspireistic identified itself as the originating provider for all calls identified in Attachment A).

⁴⁵ *See id.*; e-mail from Jessica Thompson, Senior Director, Policy & ITG Operations, USTelecom, to Genesis Monserrate, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau (Mar. 4, 2026, 7:54 PM EDT) (showing that the calls reached honeypot numbers).

⁴⁶ *Id.*

⁴⁷ *See* 47 CFR § 64.1200(a)(1).

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

B. RMD Certification Deficiencies

Voice service providers and intermediate providers, including gateway providers, are required to include their “primary address” in their RMD certifications.⁴⁹ Additionally, filers 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.⁵⁰ In addition, every provider must certify in the RMD as to whether it (i) has fully implemented the STIR/SHAKEN authentication framework on its entire network and all calls it originates are compliant with section 64.6301 or 64.6302, as applicable, (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 or 64.6302, as applicable, or (iii) has not implemented the STIR/SHAKEN authentication framework on any portion of its network.⁵¹ If the 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.⁵² A provider must include in its RMD certification a description of the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program, including a description of how it complies with its obligations to know its customers and upstream providers pursuant to § 64.1200(n)(4) and (n)(5), and the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s).⁵³

First, Aspireistic has a Defuniak Springs, FL address listed as its primary address in its RMD certification. However, the Company’s state filings show that the Florida address was replaced with a Wyoming address in 2025.⁵⁴ The Company filed its initial RMD certification in August 2025 and listed the Defuniak Springs, FL address, and it has twice updated its certification, most recently on February 23, 2026, without updating its address. Second, Aspireistic certified in its RMD filing that it is both a voice service provider and gateway provider and that “it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it carries or processes on its network are compliant with 47 CFR § 64.6301 [and 64.6302].”⁵⁵ 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.⁵⁶ The Company did not certify to partial STIR/SHAKEN implementation, nor did it identify or claim an applicable extension of the STIR/SHAKEN implementation obligation in its RMD filing for the non-IP portions of its network. In addition, the Company’s mitigation plan fails to describe any procedures it has in place to know its upstream providers. Finally, the Company describes using an “industry-standard call analytics and robocall scoring tools to

⁴⁹ 47 CFR § 64.6305(d)(4)(i).

⁵⁰ *See id.* § §§ 64.6301(a), 64.6302(a)-(d).

⁵¹ *See id.* § 64.6305(d)(1)(i), (e)(1)(i), (f)(1)(i).

⁵² *See id.* § 64.6305(d)(2)(i), (e)(2)(i), (f)(2)(i); 64.6304.

⁵³ *Id.* § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

⁵⁴ *See* Aspireistic Inc., Articles of Incorporation, Wyoming Secretary of State (July 27, 2021); Aspireistic Inc., 2025 Original Annual Report – 11808382, Wyoming Secretary of State (June 30, 2025) (showing the Company’s principal address in Sheridan, WY), available at <https://wyobiz.wyo.gov/business/FilingDetails.aspx?eFNum=143094001232004200217108251199164073082082179049>; Aspireistic RMD Certification.

⁵⁵ Aspireistic RMD Certification.

⁵⁶ *Id.*, Attach. at 1 (where the Company’s RMD plan states that “Aspireistic LLC has not yet fully implemented STIR/SHAKEN due to existing non-IP portions of our voice network”).

assess traffic risk in real time,” but the Company does not identify whether it uses any third-party analytics vendor(s) for the assessment,⁵⁷ or the name(s) of such vendor(s) if it does.⁵⁸

III. Potential Consequences

As a result of originating apparently illegal robocalls, the Company potentially faces permissive blocking under section 64.1200(k)(4)⁵⁹ of the Commission’s rules, mandatory blocking under section 64.1200(n)⁶⁰ of the Commission’s rules, and removal from the RMD for violations of section 64.6305⁶¹ 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.⁶² 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.⁶³

This letter provides notice, pursuant to section 64.1200(k)(4), that Aspireistic 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.⁶⁴ 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.⁶⁵

B. The Company Faces Mandatory Blocking Under Section 64.1200(n)(2) and (n)(3)

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.⁶⁶

This letter serves as a Notification of Suspected Illegal Traffic (Notice) under section 64.1200(n)(2) of the Commission’s rules.⁶⁷ The Company must take the following actions in response to this Notice:

⁵⁷ *Id.*, Attach. at 2.

⁵⁸ *See* 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii).

⁵⁹ 47 CFR § 64.1200(k)(4).

⁶⁰ *Id.* § 64.1200(n).

⁶¹ *Id.* § 64.6305(g).

⁶² *Id.* § 64.1200(k)(4).

⁶³ *Id.*

⁶⁴ *See id.*; *see also id.* § 64.1200(n)(2)(i)(A) (requiring a minimum of 14 days to comply with the notice).

⁶⁵ *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).

⁶⁶ 47 CFR § 64.1200(n)(3).

⁶⁷ *Id.* § 64.1200(n)(2).

1. Promptly investigate the traffic identified in Attachment A for which the Company served as the originating provider;⁶⁸
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);⁶⁹
3. Report the results of the Company's investigation to the Bureau within 14 days of the date of this Notice.⁷⁰

Depending on the outcome of the investigation, the report must contain certain details as described below:⁷¹

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;⁷²
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;⁷³ 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.⁷⁴

1. Initial Determination Order

The Bureau may issue an initial determination order stating the Bureau's initial determination that Aspireistic 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.⁷⁵ If the Bureau issues an initial determination order, the Company will have an opportunity to respond.⁷⁶

⁶⁸ *Id.* § 64.1200(n)(2)(i)(A).

⁶⁹ *Id.* § 64.1200(n)(2)(i)(A)-(B).

⁷⁰ *Id.* § 64.1200(n)(2)(i)(A).

⁷¹ *Id.* § 64.1200(n)(2)(i)(A).

⁷² *See id.*

⁷³ *Id.* § 64.1200(n)(2)(i)(B).

⁷⁴ *Id.*

⁷⁵ *Id.* § 64.1200(n)(2)(ii).

⁷⁶ *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 Aspireistic 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.⁷⁷ A final determination order may be issued up to one year after the release date of the initial determination order.⁷⁸

C. The Company Faces Removal from the RMD for Violations of and Mandatory Blocking Pursuant to Section 64.6305(g)

The Bureau may remove a provider's deficient certification from the RMD for violations of section 64.6305 pursuant to the following three-step procedure: (1) the Bureau 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; (2) if the provider fails to rectify the deficiency, the Bureau releases an order concluding that a provider's filing is deficient based on the available evidence and directing the provider to explain, within 14 days, why the Bureau should not remove the company's certification from the RMD and giving the provider a further opportunity to cure the deficiencies in its filing; and (3) 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 Bureau releases an order removing the provider from the RMD.⁷⁹

This letter serves as notification to Aspireistic of deficiencies in its RMD certification and the action that Aspireistic must take to cure the deficiencies. As explained above, the Company's RMD certification has the following deficiencies: (1) the Company does not appear to have the most current primary address; (2) 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; (3) the Company fails to describe in its robocall mitigation plan how it complies with its obligation to know its upstream providers pursuant to section 64.1200(n)(5) of the Commission's rules; and (4) the Company fails to describe in its robocall mitigation plan whether it uses any third-party analytics vendor(s), and if so, the name(s) of those vendor(s).⁸⁰

To cure these deficiencies, we direct Aspireistic to, within 14 days, (a) confirm whether the Defuniak Springs, FL address is no longer current; (b) correct the discrepancy between the Company's RMD certification and statements in its Robocall Mitigation Program Description regarding the level of STIR/SHAKEN implementation across its network, and update its certification and mitigation plan accordingly; (c) identify whether the Company uses any third-party analytics vendor(s) and the name(s) of such vendor(s).⁸¹

⁷⁷ *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).

⁷⁸ 47 CFR § 64.1200(n)(2)(iii).

⁷⁹ *See 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).

⁸⁰ Aspireistic RMD Certification.

⁸¹ We note that, in addition to the requirements described above, RMD filers are also required to identify all principals, affiliates, subsidiaries, and parent companies of the filing entity, *see Sixth Caller ID Authentication Report and Order*, 38 FCC Rcd at 2597, para. 46, and state whether, at any time in the prior two years, the filing entity (and/or any entity for which the filing entity shares common ownership, management, directors, or control)

Finally, Aspireistic 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.⁸² **Failure to respond to this letter may be used as evidence that the Company's certification is deficient with respect to its commitment to cooperate with the Commission.** 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.⁸³

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

has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description, and, if so, provide a description of any such action or investigation that complies with 47 CFR § 64.6305(d)(2)(iv), (e)(2)(iv), (f)(2)(iv). Accordingly, if Aspireistic shares common ownership, management, or control with Callsto (or Infinity SIP, Conveytel, LLC, or any other entity), Aspireistic must disclose Callsto and any other related entity as a principal, affiliate, subsidiary, or parent company, as applicable, in its RMD filing, and further disclose that Callsto was named in the Bureau's *Show Cause Order* and provide the required description of that formal agency action as it relates to Callsto.

⁸² See Aspireistic RMD Certification; see also 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii).

⁸³ See 47 CFR § 64.6305(g).

ATTACHMENT A

Role	Call Date & Time	Calling No.	Called No.	Description	Suspected Violations
ORG ⁸⁴	Nov 06, 2025 14:22 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Nov 06, 2025 19:05 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Nov 11, 2025 23:05 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Nov 18, 2025 14:22 UTC	{	}]	Annoyance-Calls-P5	47 U.S.C. § 227(b)(1)(A)(i); 47 CFR § 64.1200(a)(1)(i)
ORG	Nov 18, 2025 14:56 UTC	{	}]	Annoyance-Calls-P5	47 U.S.C. § 227(b)(1)(A)(i); 47 CFR § 64.1200(a)(1)(i)
ORG	Nov 20, 2025 19:52 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Dec 01, 2025 22:58 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Dec 04, 2025 16:24 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Jan 14, 2026 21:06 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Jan 16, 2026 19:58 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Jan 26, 2026 21:45 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).
ORG	Jan 26, 2026 20:02 UTC	{	}]	Medicare-Calls-P3	47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).

⁸⁴ “ORG” denotes that the Company was identified as the originator of the call.