

# FVRO

THE FRAUD VICTIM RIGHTS ORGANIZATION

## ANALYSIS

### Analysis of FCC's Release of Q4, 2023 Traceback Data

#### Summary

On March 29, 2024 the Federal Communications Commission (FCC) released Q4, 2023 traceback data. Combined with the previously released Q2 and Q3 traceback data, this information further reinforces the thrust of all previous evidence: that the best way to stop illegal robocalling is at the source with diligent enforcement actions against parties that make illegal robocalls. The Q2 to Q4 2023 traceback data shows there is no single gateway responsible for allowing illegal robocalls into the United States.

This data also reveals other opportunities for potential future enforcement actions to reduce robocalling thought more stringent Know Your Customer (KYC) requirements for voice service providers registering with the FCC's Robocall Mitigation Database (RMD) and more thorough investigation of suspicious RMD filings.

#### Background

The Industry Traceback Group (ITG) is a consortium of US phone companies that collectively share information about scam robocalls in an effort to protect American consumers from fraud. ITG members provide funding to the trade association USTelecom to administer the online portal the ITG uses to trace suspected scam calls (see FVRO: **Call Tracing Demystified**)<sup>1</sup>.

Since July 2021, complaints about unwanted calls made to the Federal Trade Commission (FTC) have declined 63%<sup>2</sup>. This has largely been the result deterrence promulgated by traceback requests. Criminal groups that send robocalls have learned that calls can be traced to their location and reported to law enforcement.

During this same time, however, financial loss reported to the FTC resulting from fraud initiated by phone call increased 29% (see FVRO: **Robocalling Trends**)<sup>3</sup>.

<sup>1</sup> <https://fraudvictimrights.org/call-tracing-demystified/>

<sup>2</sup> <https://public.tableau.com/app/profile/federal.trade.commission/viz/DoNotCallComplaints/Maps> Q2 2021 v. Q4 2023.

<sup>3</sup> <https://fraudvictimrights.org/Robocalling-Trends/>

This has been the result of criminal groups in India avoiding detection through traceback by shifting from making large volumes of spoofed, outbound calls to distributing call back phone numbers through computer popup messages and e-mail.

All objective data indicates that every successful effort to reduce robocalls has been the result of an enforcement action or fear of an enforcement action.

- In 2016, IRS impersonation calls dropped 85% the day after Indian police raided six criminal call centers in Thane, India (see FVRO: **How to Stop IRS Impersonation Calls**)<sup>4</sup>.
- In 2017, robocalling was reduced 50% after the FCC filed civil actions against Adrian Abramovich for sending millions of “neighbor spoofed” vacation and timeshare offer calls (see FVRO: **How to Stop Scam Vacation and Timeshare Calls**)<sup>5</sup>.
- In 2018, a series of raids by local police in and around New Delhi based on tips from the Royal Canadian Mounted Police reduced Canadian Revenue Agency (CRA) impersonation calls 77% (see FVRO: **How to Stop CRA Impersonation Calls**)<sup>6</sup>.
- Beginning in December 2019, health and health insurance related robocalls declined 60% after the FTC obtained a Temporary Restraining Order against a Canadian VoIP provider called Globex Telecom (see FVRO: **How to Stop Health Insurance Robocalls**)<sup>7</sup>.
- Beginning in July 2021, car warranty robocalls declined 95% after the FTC opened an investigation into several telemarketing businesses. The FCC also issued notices to telecom carriers in July 2022 to disconnect a different group of businesses that had been sending car warranty robocalls (see FVRO: **How to Stop Car Warranty Robocalls**)<sup>8</sup>.

### Analysis of Q4, 2023 Traceback Data

The Q4 ITG data contains 1,273 trace records from 936 suspected scam robocalls. These calls were carried by more than 184 voice service providers. Q4 data includes more than one voice service provider for many suspected scam robocalls. The FCC released data in this format so that both the suspected “Point of Entry” into the US and the suspected originators of calls were included.

It is important to note that the designation of “Point of Entry” (POE), “Originator” (ORG) or “International Originator” (IOR) are subjective determinations manually entered by ITG staff based on their best judgement. Without the cooperation of every phone company that transited a particular call, it may not always be clear where a call originated.

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<sup>4</sup> <https://fraudvictimrights.org/How-to-Stop-IRS-Impersonation-Calls/>

<sup>5</sup> <https://fraudvictimrights.org/How-to-Stop-Scam-Vacation-and-Timeshare-Calls/>

<sup>6</sup> <https://fraudvictimrights.org/How-to-Stop-CRA-Impersonation-Calls/>

<sup>7</sup> <https://fraudvictimrights.org/How-to-Stop-Health-Insurance-Robocalls/>

<sup>8</sup> <https://fraudvictimrights.org/How-to-Stop-Car-Warranty-Robocalls/>

For example, the Q4 data shows Deutsche Telekom as the “International Originator” of 37 suspected scam calls. It is highly unlikely that Deutsche Telekom, the largest phone provider in Europe—and partially owned by the German Government—originated sent scam calls to American citizens. It is far more likely that Deutsche Telekom transited scam calls received from multiple, upstream wholesale providers and did not respond to trace requests due to stringent German privacy laws. It is not known why the USTelecom staff chose to designate calls from Deutsche Telekom “IOR” (International Originator) and not “NR” (No Response).

In addition, sometimes attempts are made to identify the sources of calls past the US “Point of Entry.” Sometimes these attempts are not made. Sometimes ITG staff send trace requests for multiple calls associated with the same the apparent scam source on the same day. This is because call records cannot always be found for specific calls. In other cases, calls from the same source may come from different voice service providers. It is therefore good practice to trace multiple calls (usually five or ten) during the same trace attempt. Sometimes, however, only single calls from a single suspected source are traced.

In order to show a more accurate and representative picture of sources of scam calls, the below tables represent “Trace Attempts” where duplicate trace requests for the same source (or “Campaign Name”) through the same provider on the same day have been removed.

**Call Trace Attempts by Suspected Originating Provider**

The Q4 data shows no single voice service provider accounted for a majority of robocalls. The top Originator or International Originator accounted for 3.43% of traces<sup>9</sup>. The top 10 Originators or International Originators accounted for 20.39% of trace attempts.

Voice Service Provider	ITG Traces (De-Duplicated)	% of Traces	Top Source ("Campaign Name")
Deutsche Telekom / DTAG / Telekom Deutschland GmbH	18	3.86%	Authorized-Order-P2
Mada	16	3.43%	Authorized-Order-P2
Veriwave Telco, LLC	14	3.00%	HealthIns-Plan-P3
SwiftLink Telco, LLC	11	2.36%	HealthIns-Plan-P3
CallWin LLC	11	2.36%	Medicare-AddIBenefits
Twilio	8	1.72%	Financial-Impers-7
Sinch / Inteliquent / Onvoy / Vitelity / Neutral Tandem	7	1.50%	Financial-Impers-7
Telnyx	7	1.50%	Financial-Impers-7
Gralvat Limited	7	1.50%	Amazon-Various-P1
Clearly IP Inc.	7	1.50%	Financial-Impers-7
Unified Data Services	7	1.50%	Police-Fundraiser-P2
<b>173 Other Providers</b>	<b>353</b>	<b>75.75%</b>	

Of the top ten Originators:

- Two are foreign voice service providers.
- Two are very large, well-established US carriers.
- Three are small US-based VoIP providers.

<sup>9</sup> Excluding Deutsche Telekom.

- ❖ One is likely a foreign voice service provider incorporated in the US at a registration service used by tens of thousands of other businesses.
- ❖ Two may possibly have registered using fictitious information.

It should be noted that FVRO previously forwarded confidential reports to the FCC’s Enforcement Division about six voice service providers that may have registered with the RMD using fictitious information and two other providers that registered using stolen identities.

**Call Trace Attempts by Suspected Point of Entry Providers**

As described above, ITG data released by the FCC sometimes also includes voice service providers downstream from the suspected originator of robocalls if ITG staff believe these providers represent the first “Point of Entry” to the US. Again, these are subjective determinations based on ITG staff’s judgement. In Q4, the top 10 Points of Entry accounted for 56% of trace attempts. Seven of these 10 points of entry are large, established carriers.

Voice Service Provider	ITG Traces (De-Duplicated)	% of Traces	Top Source ("Campaign Name")
Identidad Telecom / Identidad Advertising Development LLC	33	16.75%	Authorized-Order-P2
Tata Communications (America) Inc.	24	12.18%	Authorized-Order-P2
ATT	13	6.60%	Authorized-Order-P2
Centurylink / Lumen / Qwest / Level3	9	4.57%	Authorized-Order-P2
T-Mobile USA, Inc. / Sprint	6	3.05%	Amazon-AuthorizeOrder-P3
Bandwidth	6	3.05%	Chinese-ISP/Cable/Wireless-Impers-P1
DigitalIPVoice, Inc.	6	3.05%	Authorized-Order-P2
Brightlink /NUSO LLC/ SoTel Systems / VoIPLink	5	2.54%	ISP/Cable/Wireless-Impers
VTP Communications Inc.	5	2.54%	Authorized-Order-P1
Orange Carriers USA	5	2.54%	Authorized-Order-P2
<b>49 Other Providers</b>	85	43.15%	

On November 27, 2023 FCC and FTC sent separate warning letters to Identidad Advertising Development. 14 sources of calls flowing through Identidad Advertising and documented in ITG reports are shown below.

Voice Service Provider Sending Calls to Identidad	ITG Traces	First Trace	First Last	Top Source ("Campain Name")
Mada	39	10/11/23	11/03/23	Authorized-Order-P2
NGT Networks Pte. Ltd	9	11/30/23	12/04/23	Authorized-Order-P2
sky-voice	4	11/14/23	11/20/23	Chinese-ISP/Cable/Wireless-Impers-P1
Columbus Communications Jamaica (C&W)	4	11/14/23	12/05/23	PCH-Various-P4
Deutsche Telekom / DTAG / Telekom Deutschland GmbH	3	11/07/23	11/07/23	Authorized-Order-P2
WATEEN TELECOM INC MALAYSIA	3	10/05/23	10/11/23	Authorized-Order-P2
Ivoipe Inc	3	11/14/23	11/15/23	Authorized-Order-P2
Perfect call	3	11/13/23	11/15/23	Authorized-Order-P2
Flowcalls pvt ltd	1	12/07/23	12/07/23	Verizon-Impers-P1
Zenit Telecommunication LLC	1	10/04/23	10/04/23	Amazon-AuthorizeOrder-P3
LI FEN / ELLO	1	11/14/23	11/14/23	Chinese-ISP/Cable/Wireless-Impers
Circells Mobile Telekom (China)	1	11/20/23	11/20/23	Chinese-PackageDelivery
teleglobe	1	11/15/23	11/15/23	Authorized-Order-P2
T-Mobile USA, Inc. / Sprint	1	11/14/23	11/14/23	PCH-Various-P4

It is not clear why the FCC and FTC sent letters to Identidad and not voice service providers like Mada that sent calls to Identidad.

On November 27, 2023 FCC and FTC sent separate warning letters to Tata Communications. 13 sources of calls flowing through Tata and documented in ITG reports are shown below.

Voice Service Provider Sending Calls to Tata	ITG Traces	First Trace	First Last	Top Source ("Campaign Name")
Deutsche Telekom / DTAG / Telekom Deutschland GmbH	17	10/12/23	11/30/23	Authorized-Order-P2
ushatel	5	11/08/23	11/09/23	Amazon-AuthorizeOrder-P3
Flowcalls pvt ltd	3	12/07/23	12/07/23	Verizon-Impers-P1
Centurylink / Lumen / Qwest / Level3	2	10/27/23	12/15/23	Authorized-Order-P1
GREEN PACKET GLOBAL PTE LTD	2	11/28/23	11/30/23	Amazon-AuthorizeOrder-P3
Royal Infotech	2	12/12/23	12/13/23	Authorized-Order
Voiceland S.A. / Voiceland Telecommunications	2	12/15/23	12/15/23	Financial-Impers-7
AT&T Comercializacion Movil S. de R.L. de C.V.	1	12/11/23	12/11/23	Chinese-ISP/Cable/Wireless-Impers-P1
Dexatel OU	1	10/27/23	10/27/23	Authorized-Order-P1
Mokrina	1	12/12/23	12/12/23	Authorized-Order-P2
Protel S.A.L. (Lebanon)	1	11/08/23	11/08/23	Amazon-AuthorizeOrder-P3
Telekom Malaysia Bhd.	1	11/07/23	11/07/23	Authorized-Order-P2
Two Brothers Telecom	1	12/01/23	12/01/23	Amazon-AuthorizeOrder-P3

It is not clear why the FCC and FTC sent letters to Tata and not voice service providers like Deutsche Telekom that sent calls to Tata.

On November 27 and 29, 2023 FCC and FTC sent separate warning letters to CenturyLink. 12 sources of calls flowing through CenturyLink and documented in ITG reports are shown below.

Voice Service Provider Sending Calls to CenturyLink	ITG Traces	First Trace	First Last	Top Source ("Campaign Name")
ushatel	10	11/13/23	11/15/23	Authorized-Order-P2
Tata Communications (America) Inc.	2	10/27/23	12/15/23	Authorized-Order-P1
CITIC TELECOM INTERNATIONAL LIMITED	2	12/21/23	12/21/23	Amazon-Various-P1
NGT Networks Pte. Ltd	2	11/30/23	12/01/23	Authorized-Order-P2
zippyzi studios pvt ltd	1	11/21/23	11/21/23	Authorized-Order-P2
EXATEL S.A.	1	10/12/23	10/12/23	Authorized-Order-P2
Mokrina	1	10/27/23	10/27/23	Authorized-Order-P1
Barter VoIP Ltd / Intershore Consult (BVI) Ltd.	1	11/15/23	11/15/23	Authorized-Order-P2
Voiceland S.A. / Voiceland Telecommunications	1	12/15/23	12/15/23	Financial-Impers-7
PCCW Global, Inc. / Gateway Global Communications LTD	1	12/21/23	12/21/23	Amazon-Various-P1
Dexatel OU	1	10/27/23	10/27/23	Authorized-Order-P1
TeliaSonera International Carrier / Telia Carrier / Arelion USA Inc	1	12/21/23	12/21/23	Amazon-Various-P1

It is not clear why the FCC and FTC sent letters to CenturyLink and not voice service providers like “ushatel” (Usha Tel<sup>10</sup>) that sent calls to CenturyLink. Usha Tel does not appear to be registered in the RMD.

<sup>10</sup> <https://ushatel.net/>

On November 27, 2023 FCC and FTC sent separate warning letters to Bandwidth. Eight sources of calls flowing through Bandwidth and documented in ITG reports are shown below.

Voice Service Provider Sending Calls to Bandwidth	ITG Traces	First Trace	First Last	Top Source ("Campaign Name")
Circells Mobile Telekom (China)	6	11/14/23	11/21/23	Chinese-ISP/Cable/Wireless-Impers-P1
Innovative Tech LLCdba Foneping	1	11/21/23	11/21/23	Authorized-Order-P2
Teleglobal Pte Ltd	1	11/30/23	11/30/23	Chinese-ISP/Cable/Wireless-Impers-P1

It is not clear why the FCC and FTC sent letters to Bandwidth and not voice service providers like “Circells Mobile Telekom”<sup>11</sup> that sent calls to Bandwidth. Circells does not appear to be registered in the RMD.

It is not clear why the FCC and FTC sent letters to these and other voice service providers identified as possible “Points of Entry” in ITG data and not to other possible “Points of Entry” like T-Mobile or AT&T.

### Implications for Policy Makers

Three important facts can be derived from this ITG data.

First, all available data overwhelmingly shows that there is no such thing as a “gateway provider”—at least not in the sense that a limited number of voice service providers are “allowing” any significant portions of illegal robocalls onto US networks. There are more than 8,000 voice service providers registered in the RMD. Criminals seeking to send illegal robocalls to Americans can easily spread calls out across providers in order to avoid proactive detection. Trying to police robocalling through intermediary transit points is, at best, highly inefficient and ineffective. Illegal robocalls are most easily stopped at the source.

In the event any particular voice service provider is responsible for more than 5% of ITG traced calls, regulators should follow up with specific questions about measures taken to mitigate illegal calls.

- How long has the upstream provider been a customer of the “Point of Entry?”
- How long has the upstream provider been in business?
- What KYC measures were used when onboarding the upstream provider?
- Is the upstream provider still a customer of the “Point of Entry?”
- What is the upstream provider’s volume of traffic?
- Where is the upstream provider located and what is their contact information?
- Did the “Point of Entry” examine the upstream provider’s traffic and determine whether or not patterns matched traced calls?
- Did the upstream provider respond to traceback requests?

<sup>11</sup> <http://www.circells.com/>

Otherwise, the most effective means of stopping illegal robocalls is to trace them to their source and pursue enforcement actions at the source.

Second, to this end, the FCC should comply with Section 11 of the TRACED Act (47 USC 227b–2(a)). This law requires the FCC to report evidence of criminal robocalling to the Department of Justice. Since 2020, the FCC has only made seven such referrals, even though ITG traceback data available to the FCC documents hundreds of criminal robocalling violations. Most criminal robocalls originate from overseas. The Department of Justice has the resources necessary to interface and work with foreign law enforcement agencies.

Third, the FCC's KYC requirements for RMD registration need improvement. Such improvements will materially reduce illegal robocalls.