

ANALYSIS

Analysis of FCC’s Release of Q3, 2024 Traceback Data

Summary

On December 30, 2024 the Federal Communications Commission (FCC) released Q3, 2024 traceback data¹. This information illustrates four important points for policy makers.

1. The emerging trend toward making outbound scam calls using prepaid SIM cards first identified in Q2 2024 has been confirmed. 23% of calls traced in Q3 originated from major U.S. wireless providers.
2. Aside from this new trend toward use of prepaid SIM cards, the data shows, for the fourth consecutive documented quarter, that there is no single so-called “gateway” responsible for allowing illegal robocalls into the United States.
3. Significant additional reductions in illegal robocalls are possible if the FCC applies Know Your Customer identification procedures to registrants to the Robocall Mitigation Database.
4. The FCC needs to more diligently investigate complaints and traceback data provided by industry.

Background

The Industry Traceback Group (ITG) is a consortium of US phone companies that collectively share information about suspected illegal 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**)².

Since July 2021, complaints about unwanted calls made to the Federal Trade Commission (FTC) have declined 58%³. This has largely been the result of 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.

¹ <https://www.fcc.gov/document/fcc-releases-rollback-transparency-report-3>

² <https://fraudvictimrights.org/call-tracing-demystified/>

³ <https://public.tableau.com/app/profile/federal.trade.commission/viz/DoNotCallComplaints/Maps> Q2 2021 v. Q1 2024.

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**)⁴.
- 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**)⁵.
- 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**)⁶.
- Beginning in December 2019, health and health insurance related robocalls declined 60% after the Federal Trade Commission (FTC) obtained a Temporary Restraining Order (TRO) against a Canadian VoIP provider called Globex Telecom (see FVRO: **How to Stop Health Insurance Robocalls**)⁷.
- Beginning in July 2021, car warranty robocalls declined 95% after the FTC opened an investigation into several telemarketing businesses. The FCC also issued advisories 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**)⁸.

During this same time, however, financial loss reported to the FTC resulting from fraud initiated by phone call increased 32% (see FVRO: **Robocalling Trends**)⁹. This has been the result of criminal groups in India avoiding traceback by shifting from making large volumes of spoofed, outbound calls to distributing call back phone numbers through computer pop-up ads and e-mail messages (see FVRO: **How to Stop Tech Support Fraud**)¹⁰.

Analysis of Q3, 2024 Traceback Data

The Q3 2024 ITG data contains 1,048 trace records from 882 suspected scam robocalls. These calls were carried by more than 201 voice service providers. This represents a 22% reduction in traced calls from Q1 2024.

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

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

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

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

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

⁹ <https://public.tableau.com/app/profile/federal.trade.commission/viz/FraudReports/FraudFacts> > Payment & Contact Methods; <https://fraudvictimrights.org/Robocalling-Trends/>

¹⁰ <https://fraudvictimrights.org/how-to-stop-tech-support-fraud/>

Period	Traced Calls
Q3 2024	882
Q2 2024	570
Q1 2024	1,072
Q4 2023	1,273
Q3 2023	1,218

Traceback transparency report data includes more than one voice service provider for some individual scam robocalls. The FCC releases data in this format data so that both the suspected “Point of Entry” into the US and the suspected originators of calls are 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.

Provider	Traced Calls ¹¹	First Trace	Last Trace	Call - Campaign Description
T-Mobile USA, Inc.	151	07/02/24	09/30/24	Authorized-Order-P2 Order Scam
Ananya traders llc	59	07/01/24	09/30/24	BrandImpers-Order Order Scam
Verizon	37	07/02/24	09/23/24	Authorized-Order-P2 Order Scam
Siphony, LLC	24	07/10/24	09/24/24	Financial-Hardship-P1 Debt Reduction
Vonage	21	07/01/24	09/26/24	Authorized-Order-P2 Order Scam
SK TELECO LLC	19	07/09/24	07/19/24	BrandImpers-Order Order Scam
Stacy Newsome LNCC	19	07/22/24	09/03/24	BrandImpers-Order Order Scam
Voice Fetch	18	09/11/24	09/23/24	ISP/Cable/Wireless-Impers-P1 Cable/Phone Impersonation
AT&T	17	07/02/24	09/30/24	Authorized-Order-P2 Order Scam
Voip Torque	17	08/06/24	09/19/24	ISP/Cable/Wireless-Impers Cable/Phone Impersonation
Other Providers	191¹²			

Use of Prepaid SIM Cards

Q2 2024 marked the first time ever that the three largest wireless providers—AT&T, Verizon, and T-Mobile—were all listed in the top ten sources of traced robocalls. Robocalls mostly enter the U.S. through wholesale VoIP providers and terminate to major carriers like AT&T, Verizon, and T-Mobile. Previously, robocalls in the U.S. almost never originated from wireless carriers. Q3 saw an escalation of this trend, with 23% of traced calls originating from T-Mobile, Verizon, or AT&T¹³.

This new trend likely indicates use of prepaid SIM cards to originate robocalls from inside the U.S. Given that the robocalling campaigns originating from these wireless numbers are the same campaigns that have previously originated from overseas, it is likely these prepaid SIM cards are being remotely managed through SIM box equipment.

The trend toward prepaid SIMs is also corroborated by empirical observations of providers used for call back numbers on tech support fraud computer pop-up ads. As described above, in mid to late 2021, criminal groups

¹¹ Not including records labeled “POE.”

¹² 29 providers had trace records that were only labeled “POE.”

¹³ All three wireless providers can also transit whole calls that originated at VoIP, but such calls should be labeled “POE” and excluded from these figures.

in India began to transition from outbound scam calls to delivering call back numbers on tech support fraud computer pop-up ads and e-mail messages. Between August and December 2024, online message board complaints documented 373 T-Mobile numbers used as call back numbers for various scams.

This further emphasizes the point telecom fraud professionals have been making for years: stopping illegal robocalls at the source through enforcement against the parties that make robocalls is more efficient and effective than trying to block robocalls at the network. Network measures to label and block robocalls are inaccurate, ineffective, and costly. However, because a relatively small number of criminals are responsible for a large majority of robocalls, enforcement has historically been proven to be the most efficient and effective means of stopping robocalls.

No Single Gateway

The top ten sources of robocalls in the Q3 data accounted for 43% of traced calls. 162 other voice service providers were identified as sending the rest. This is the largest portion of overall traced robocalls the top ten sources have ever been responsible for. This is driven by the above-described transition toward using prepaid SIM cards. Excluding T-Mobile, AT&T, and Verizon, the top ten sources of robocalls in the Q3 traceback data accounted for 25% of traced calls.

Voice service providers who deliberately allow illegal traffic onto their network can and should be held accountable. However, there are more than 9,000 registered voice service providers in the U.S. alone. Sending traffic through multiple routes and replacing service providers if others become unavailable does not place a significant burden on criminals sending robocalls.

Better Know Your Customer (KYC) Procedures by the FCC Will Yield Additional Reductions in Illegal Robocalls

Of the remaining top ten sources of Q3 robocalls (not counting wireless providers AT&T, T-Mobile, and Verizon):

- Two were almost certainly registered as voice service providers by means of identity theft, using the name and address of real U.S. citizens without those individuals' knowledge or consent;
- Two appear to be foreign VoIP providers that registered in the U.S. using fictitious information (business contact names with no social media or telecom sales history, incorporated at a PO boxes in 2023, and they did not file or renew annual State corporate registrations);
- One is likely a foreign VoIP registered in the U.S. without any actual U.S. presence (incorporated in Montana in 2024 at a personal mail box; phone number, website, and e-mail address already disconnected).
- One has previously received cease and desist letters from the FCC.
- One was likely reported to law enforcement in 2021.

There does not appear to be any process for validating an FCC registrant's information. The use of "pop-up" straw voice service providers that incorporate at U.S. PO boxes and then disappear once they receive traceback requests has become commonplace. There are more than 200 voice service providers registered at addresses with more than five voice service providers each.

On December 17, 2024 the FCC published a list of 2,412 voice service providers subject to exclusion from the U.S. industry within fourteen days due to reportedly deficient Robocall Mitigation Database filings. Of the seven above-described potentially problematic voice service providers, four are on this list. In addition, a periodic review of filings is not the same as verification of a voice service provider’s identity at the time of filing.

The Fraud Victim Rights Organization filed eleven complaints through the FCC’s Private Entity Portal about voice service providers that appear to have been registered by means of identity theft using the names and addresses of real people without those individuals’ knowledge or consent. The FCC took partial action on two providers to remove stolen personal information from its public databases. The FCC has taken no action regarding the other nine suspected fraudulent providers.

Enhanced KYC procedures for Robocall Mitigation Database registration will result in additional reductions in robocalling.

Diligent Investigation of Traceback Results

Since 2017, the Industry Traceback Group has attempted to trace more than 20,000 suspected scam calls. More than half of these attempts were successful. Millions more calls have been traced by U.S. telecom providers unilaterally or bilaterally outside the ITG. Most of this information has been provided to law enforcement. Most of this information has been ignored by law enforcement.

26 voice service providers listed on the Q3 2024 Traceback Transparency report did not respond to half of the traceback requests they received. Only half of these providers are listed on the FCC’s December 17 exclusion notice.

For example, Ananya Traders, LLC was incorporated at a shared address used by thousands of other businesses in Wyoming in 2021. Online records show it is actually based in India¹⁴. Its Wyoming corporate registration was dissolved in 2022. In its RMD filing it certified that it has fully implemented STIR/SHAKEN. It did not file a robocall mitigation plan. It received at least 81 traceback requests between April 10, 2023 and September 30, 2024 (the most recent date traceback records have been released). It reportedly did not respond to any of them. Yet it is still a voice service provider in good standing with the FCC. It was not listed on the FCC’s December 17 notice of possible exclusions.

Provider	Non-Responses	% Non-Response	First Non-Response	Last Non-Response	Listed on Dec. 17, 2024 Exclusion Notice
PRAMOSOFT TECHNOLOGIES	10	100%	04/07/23	09/26/24	
Ananya traders llc	81	100%	04/10/23	09/30/24	
Innovative Tech LLC dba Foneping	36	100%	04/13/23	08/29/24	X
BPO VOIP	17	100%	05/05/23	09/30/24	
Voice Fetch	33	100%	05/15/23	09/23/24	X
Voip Torque	45	74%	05/31/23	09/19/24	X
Zone-tel	16	100%	06/06/23	09/11/24	X
CallWin LLC	77	68%	06/15/23	09/24/24	X

¹⁴ <https://ananyatraders.in/contact/#>
<https://maps.app.goo.gl/BR63K62rrwC3ZZBF8>

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Provider	Non-Responses	% Non-Response	First Non-Response	Last Non-Response	Listed on Dec. 17, 2024 Exclusion Notice
Ooma Inc.	6	55%	06/23/23	01/19/24	
Gralvat Limited	21	84%	07/21/23	07/19/24	
Tiera Enterprises	28	88%	08/02/23	09/16/24	X
global voip	9	100%	08/09/23	09/25/24	X
TERRA VOIP	29	100%	08/25/23	07/18/24	X
Pleedex LLC	23	100%	10/10/23	09/24/24	X
Belthrough	10	63%	10/20/23	09/17/24	
INTELLIVISION TECH	7	100%	10/27/23	08/08/24	X
ushatel	22	96%	11/08/23	07/11/24	
Stacy Newsome LNCC	16	48%	11/21/23	09/03/24	X
Telonate	7	78%	02/28/24	05/15/24	
Techmax BPO	17	100%	03/07/24	09/10/24	
Soft care Solution	9	100%	03/12/24	09/30/24	X
voip tech house	7	100%	04/26/24	09/05/24	
Telin Neutrafix	9	100%	07/11/24	08/09/24	
Grapevine Ventures Inc	7	100%	08/13/24	08/30/24	
VoIP Talk Pro	8	100%	09/10/24	09/17/24	
Affinity Technology Solutions LLC	7	100%	09/20/24	09/26/24	X