

⁶ See *id.* § 64.1200(n)(3).

2. In addition, this Order directs Aspireistic to show cause as to why its certification⁷ should not be removed from the Robocall Mitigation Database (RMD) because the certification contains contradictory statements with respect to certain required information and omits other required information entirely.⁸ Failure to cure these deficiencies within 14 days will result in removal of Aspireistic's certification from the RMD, in which case all voice service providers and intermediate providers will be required to cease accepting calls directly from Aspireistic.⁹

II. BACKGROUND

A. Voice Service Provider Mandatory Blocking Rules

3. Protecting consumers in the United States from the dangers and risks of unwanted and illegal robocalls is the Commission's top consumer protection priority.¹⁰ Voice service providers can—and sometimes do—facilitate, or even protect, bad-actor callers.¹¹ When bad-actor callers are shielded by other bad-actor voice service providers, it is significantly more difficult to stop the calls.¹² To address the problem, the Commission requires voice service providers to block illegal traffic in some cases.¹³ On May 19, 2022, the Commission adopted the *Gateway Provider Order*, which built upon the Commission's prior, permissive call blocking rules to require gateway providers to block illegal traffic when notified of such traffic by the Commission.¹⁴ On May 18, 2023, the Commission expanded the

⁷ Aspireistic Inc. (RMD0029141), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed June 11, 2026), https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=bd09ed8c1b13e290b2252062f54bcb8f&view=sp (Current Aspireistic RMD Certification).

⁸ Notice, *supra* note 2, at 9; *see also* 47 CFR § 64.6305(d)-(f) (RMD certification requirements for voice service providers, gateway providers, and non-gateway intermediate providers).

⁹ *Id.* § 64.6305(g); *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) (*Sixth Caller ID Authentication Order*). Notwithstanding this requirement, “[a] provider may not block a voice call under any circumstances if the call is an emergency call placed to 911” and “must make all reasonable efforts to ensure that it does not block any calls from public safety answering points and government emergency numbers.” 47 CFR § 64.6305(g)(5).

¹⁰ *Stop Unwanted Robocalls and Texts*, Fed. Commc'ns Comm'n, <https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts> (last visited Aug. 12, 2026) (“Stopping illegal robocalls is the Federal Communication Commission's (FCC) top consumer protection priority.”).

¹¹ *See Advanced Methods to Target and Eliminate Unlawful Robocalls*, 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, 5410, para. 15 (2023) (*Seventh Call Blocking Order*). For purposes of this section II.A and other sections below that address the mandatory blocking rule in section 64.1200(n)(2), the term “voice service provider” refers to that term as used in section 64.1200 of the Commission's rules, which is based on the definition of “voice service” in 47 CFR § 64.1600(r) and includes intermediate providers.

¹² *See Seventh Call Blocking Order*, 38 FCC Rcd at 5410, para. 15.

¹³ *Id.* at 5415, para. 29; 47 CFR § 64.1200(n)(2)(i)(A).

¹⁴ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Sixth Report and Order in CG Docket No. 17-59, Fifth Report and Order in WC Docket No. 17-97, Order on Reconsideration in WC Docket No. 17-97, Order, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, and Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, 37 FCC Rcd 6865, 6898, para. 75 (2022) (*Gateway Provider Order*); *see* 47 CFR § 64.1200(k)(1)-(3) (listing permissive blocking scenarios such as Do-Not-Originate lists, invalid and unallocated numbers, and reasonable analytics).

mandatory call blocking framework created in the *Gateway Provider Order* to all voice service providers.¹⁵

4. Mandatory call blocking pursuant to sections 64.1200(n)(2) and (n)(3) can entail a three-step process if the notified provider fails to take action as directed by the Bureau.¹⁶ *First*, a provider will receive a notification of suspected illegal traffic from the Bureau requiring the provider to investigate the suspected illegal traffic, report the results of the investigation to the Bureau, and block the identified traffic and substantially similar traffic unless it determines the identified traffic is not illegal.¹⁷ *Second*, if the provider fails to respond to the notification, the Bureau determines that the response is insufficient, the Bureau determines that the provider is continuing to originate substantially similar traffic, or the Bureau determines that the traffic is illegal despite assertions by the provider to the contrary, then the Bureau will issue an initial determination order.¹⁸ The provider then has an opportunity to respond.¹⁹ *Third*, if the Bureau determines that the provider's response to the initial determination order is inadequate (including if the provider fails to respond), or if it continues to transmit substantially similar traffic, the Bureau may issue a final determination order mandating all immediate downstream providers block and cease accepting all traffic from the provider starting 30 calendar days from release of the final determination order.²⁰ Downstream providers may choose to initiate blocking sooner than 30 calendar days from the release of the final determination order if, prior to initiating blocking, they provide the Commission with notice and a brief summary of the basis for their determination that the provider failed to effectively mitigate illegal traffic within 48 hours of being notified by the Commission or failed to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls.²¹

B. RMD Certification Rules and Removal Procedures

5. The Commission established the RMD in 2021 to promote transparency and effective robocall mitigation.²² Voice service providers, gateway providers, and non-gateway intermediate providers must file a certification in the RMD.²³ The Commission may remove a provider's filing from

¹⁵ *Seventh Call Blocking Order*, 38 FCC Rcd at 5415-17, paras. 29-36 (requirements codified at 47 CFR § 64.1200(n)(2)-(3)).

¹⁶ 47 CFR § 64.1200(n)(2)-(3).

¹⁷ *Id.* § 64.1200(n)(2)(i)(A).

¹⁸ *Id.* § 64.1200(n)(2)(ii).

¹⁹ *Id.*

²⁰ *Id.* § 64.1200(n)(2)(iii) (permitting issuance of a Final Determination Order up to one year after release of the Initial Determination Order); *id.* § 64.1200(n)(3); *One Eye LLC Final Determination Order*, EB Docket No. 22-174, 38 FCC Rcd 4211, 4214, para. 8 (EB 2023) (finding that One Eye's failure to respond to the Initial Determination Order was an inadequate response).

²¹ 47 CFR § 64.1200(n)(2)(iii); *see id.* § 64.1200(k)(4).

²² *See Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902-03, paras. 82-83 (2020) (*Second Caller ID Authentication Order*); *Wireline Competition Bureau Announces Opening of Robocall Mitigation Database and Provides Filing Instructions and Deadlines*, WC Docket No. 17-97, Public Notice, 36 FCC Rcd 7394 (WCB 2021) (announcing the immediate opening of the RMD on April 20, 2021).

²³ 47 CFR § 64.6305(d)-(f). Paragraph (d) applies to voice service providers; paragraph (e) applies to gateway providers; and paragraph (f) applies to non-gateway intermediate providers. For purposes of this section, the term "voice service provider" is based on the definition of "voice service" in section 64.6300 of our rules, which applies to the RMD requirements in section 64.6305. *See id.* § 64.6300(o). As such, the term "voice service provider" excludes intermediate providers (*i.e.*, gateway providers and non-gateway intermediate providers), as those terms are defined in section 64.6300. *See id.* § 64.6300(d), (g), (i).

the RMD that it finds “deficient in some way.”²⁴ To do so, the Commission will first contact the provider to notify it that its filing is deficient, explain the nature of the deficiency, and provide 14 days for the provider to cure the deficiency.²⁵ If the provider fails to cure the deficiency, the Bureau will release an order to show cause concluding that the provider’s filing is deficient based on the available evidence. The order will direct the provider to—within 14 days—cure the deficiency in its filing and explain why the Bureau should not remove the provider’s certification from the RMD.²⁶ If the provider fails to cure the deficiency or provide a sufficient explanation why its filing is not deficient within that 14-day period, the Bureau will release an order removing the provider from the RMD.²⁷

6. Four requirements related to RMD certifications by originating and gateway providers are relevant here.²⁸ *First*, a company’s RMD certification must include its current primary address.²⁹ Second, voice service providers and gateway 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.³⁰ In connection with this requirement, every originating and gateway provider must certify in the RMD as to whether it (i) has fully implemented the STIR/SHAKEN authentication framework across 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(a) and (b), or 64.6302, as applicable, or (iii) has not implemented the STIR/SHAKEN authentication framework on any portion of its network.³¹ If the provider certifies to less than full STIR/SHAKEN implementation, it must identify the type of extension(s) received under section 64.6304 and the basis for the extension(s), or explain why it is unable to implement STIR/SHAKEN.³² *Third*, 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 (applicable to voice service providers) and know its upstream providers (applicable to all providers) pursuant to sections 64.1200(n)(4) and (n)(5), respectively.³³ *Fourth*, a provider must include in its RMD certification a description of the analytics system(s) it uses to

²⁴ *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (regarding voice service provider filings); *see also Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40 (adopting the same approach for gateway provider filings); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 57 (adopting the same approach for non-gateway intermediate provider filings).

²⁵ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

²⁶ *Id.* (quoting *Global UC Inc.*, Removal Order, 37 FCC Rcd 13376, 13378, para. 5 (EB 2022) (*Global UC Removal Order*)).

²⁷ *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

²⁸ Aspireistic certifies that it serves as an originating provider and as a gateway provider. *See* Current Aspireistic RMD Certification, *supra* note 7.

²⁹ 47 CFR § 64.6305(d)(4)(i), (e)(4)(i).

³⁰ 47 CFR §§ 64.6301(a), 64.6302(d).

³¹ *See id.* § 64.6305(d)(1)(i)-(iii), (e)(1)(i)-(iii).

³² *See id.* §§ 64.6305(d)(2)(i), (e)(2)(i); 64.6304.

³³ *Id.* § 64.6305(d)(2)(ii), (e)(2)(ii).

identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s).³⁴

7. Under the Commission's rules, intermediate providers and voice service providers shall accept calls directly from a domestic provider only if that provider's certification appears in the RMD.³⁵ Removal of a domestic provider's certification from the RMD therefore requires all intermediate providers and voice service providers to cease accepting all calls directly from the provider.³⁶

C. Aspireistic's Origination of Suspected Illegal Robocalls

8. The Notice identified suspected illegal traffic originated by Aspireistic, comprising robocalls placed without the prior express consent of the called parties.³⁷ This traffic specifically included: (1) robocalls placed to emergency telephone lines; and (2) robocalls placed to cellular telephones concerning purported Medicare plans and unclaimed benefits.³⁸ An Aspireistic customer based in West Bengal, India, used Aspireistic's services to place non-emergency robocalls to the emergency telephone lines of the Page County Emergency Communications Center.³⁹ Two additional customers, based in Egypt and India, used Aspireistic's services to place pre-recorded Medicare-related voice message calls to consumers.⁴⁰ Some messages informed recipients that they had "unclaimed reimbursements left from 2025 Medicare plans" or other unclaimed Medicare benefits.⁴¹ Others, with minor variations, delivered the following message:

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?⁴²

Consumers reported receiving these calls "daily," with one consumer stating that "[i]t begins in the morning and goes on all day."⁴³

9. The Notice and the Commission's rules required Aspireistic to investigate the identified traffic and report the results of its investigation to the Bureau within 14 days.⁴⁴ If the Company determined that it was the originating or gateway provider for the identified traffic and did not conclude that the traffic was legal, its report was required to include both a certification that it is blocking the identified traffic and will continue to do so⁴⁵ and a description of its plan to identify and block or cease

³⁴ *Id.* § 64.6305(d)(2)(ii), (e)(2)(ii).

³⁵ *Id.* § 64.6305(g).

³⁶ *See id.*

³⁷ Notice, *supra* note 2, at 4 ("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").

³⁸ *Id.* at 2-3.

³⁹ *Id.*

⁴⁰ *Id.* at 3.

⁴¹ *Id.*

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Id.* at 7-8; *see also* 47 CFR § 64.1200(n)(2)(i)(A) ("The . . . Notification of Suspected Illegal Traffic shall give the identified provider a minimum of 14 days to comply with the notice.").

⁴⁵ Notice, *supra* note 2, at 7-8; *see also* 47 CFR § 64.1200(n)(2)(i)(A)(I).

accepting substantially similar traffic on an ongoing basis.⁴⁶ Alternatively, if Aspireistic reasonably concluded either that the identified traffic was not illegal or that it did not serve as the gateway or originating provider for any of the traffic, its report was required to explain the basis for that conclusion.⁴⁷ If Aspireistic concluded that it was not the gateway or originating provider, but instead a non-gateway intermediate or terminating provider, it was required to “identify the upstream provider(s) from which the Company received the identified traffic and, if possible, take steps to mitigate the traffic.”⁴⁸

D. Aspireistic’s Deficient RMD Certification

10. While investigating the above-described suspected illegal traffic, the Bureau identified four deficiencies with Aspireistic’s RMD certification. The Notice explained these deficiencies to the Company:

(1) the Company[’s certification] 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).⁴⁹

The Notice directed Aspireistic to cure these deficiencies within 14 days and specifically explained the steps necessary to cure the deficiencies:

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).⁵⁰ The Notice also warned Aspireistic that failure to respond may be used as evidence that the Company’s certification is deficient with respect to its commitment to cooperate with the Commission.⁵¹

E. Aspireistic’s Relationship with Other Voice Service Providers

11. The Notice also explained that the evidence suggests Aspireistic is related to three downstream providers to which it routed the apparently illegal traffic identified in Attachment A of the Notice: Callsto, INFINITYSIP, and Conveytel, LLC.⁵² First, Aspireistic and Callsto each originated calls for the same two robocalling campaigns, namely the non-emergency robocalls to emergency

⁴⁶ Notice, *supra* note 2, at 8; *see also* 47 CFR § 64.1200(n)(2)(i)(A)(2).

⁴⁷ Notice, *supra* note 2, at 8; *see also* 47 CFR § 64.1200(n)(2)(i)(B).

⁴⁸ *Id.*

⁴⁹ Notice, *supra* note 2, at 9.

⁵⁰ *Id.*

⁵¹ *Id.* at 10 (explaining that “Aspireistic certified in its RMD filing, that it would cooperate with the FCC in investigating and stopping any illegal robocallers that use its service to carry or process calls”); *see also* 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii).

⁵² Notice, *supra* note 2 at 4-5.

telephone lines and the Medicare-related robocalls.⁵³ *Second*, Aspireistic and the three downstream providers shared unique identifying information from October 2025 to January 2026, and each of the four companies conducted at least some of its operations from Pakistan between November 6, 2025, and January 30, 2026.⁵⁴ *Third*, Aspireistic and Callsto submitted nearly identical robocall mitigation plans to the RMD.⁵⁵

12. The Notice stated that “RMD filers are also required to identify all principals, affiliates, subsidiaries, and parent companies of the filing entity,⁵⁶ 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) 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).”⁵⁷ Additionally, the Notice directed that, “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.”⁵⁸

F. Aspireistic’s Response to the Notice

13. On June 11, 2026, the Bureau sent the Notice to Aspireistic by email, to the email address listed in its RMD certification at that time (info@aspireistics.com), and by certified mail, to both the DeFuniak Springs, Florida address listed in its RMD certification and the Company’s Sheridan, Wyoming address.⁵⁹ The same day, Aspireistic sent an email to the Bureau suggesting that it never received the emailed Notice and instead learned of the Notice from its “upstream provider.”⁶⁰ Aspireistic’s June 11, 2026 email requested the Bureau to send it a copy of the Notice.⁶¹ The United States Postal Service returned the certified mail envelope sent to the Florida address, marked “RETURN TO SENDER” and

⁵³ *Id.* at 4.

⁵⁴ *Id.*

⁵⁵ *Id.* at 4-5.

⁵⁶ See *Sixth Caller ID Authentication Report and Order*, 38 FCC Rcd at 2597, para. 46.

⁵⁷ Notice, *supra* note 2 at 9-10, n.81.

⁵⁸ *Id.*

⁵⁹ See E-mail from Enforcement Bureau, FCC, to Christopher Anderson, Aspireistics, (June 11, 2026 12:20 EDT)(on file at EB-TCD-26-00040126).

⁶⁰ See E-mail from Ahsan Ahmad, CEO, Aspireistic Inc., to Telecommunications Consumers Division, FCC Enforcement Bureau (June 11, 2026, at 14:22 EDT) (on file at EB-TCD-26-00040126) (“We have received this below notification from our upstream provider . . . We believe, our RMD email was bounced back from FCC. Requesting you to provide copy of FCC letter here so we can reply.”). The fact that Aspireistic requested a copy of the Notice indicates that the info@aspireistics.com email address that was listed in the RMD was invalid, which indicates yet another RMD certification deficiency. However, Aspireistic updated its robocall mitigation contract information in the RMD, including its contact email address, on June 11, 2026.

⁶¹ See *id.* The Bureau sent another copy of the Notice to Aspireistic on June 26, 2026, by email using the contact email address that had been updated in the RMD on June 11, 2026. See E-mail from Enforcement Bureau, FCC, <mailto:info@aspireistics.com> to Ahsan Ahmad, CEO, Aspireistic (June 26, 2026 19:33 EDT) (on file at EB-TCD-26-00040126).

“UNABLE TO FORWARD,” because addressee Aspireistic was “NOT KNOWN” at that address.⁶² The certified delivery to the Wyoming address was successful: the Company’s registered agent, Registered Agents, Inc., stamped the return receipt “Received by: Registered Agent” on June 16, 2026.⁶³ Therefore, even if the Company may not have received the June 11, 2026 email, it received the Notice via its Wyoming registered agent on June 16, 2026.

14. On July 7, 2026—12 days after its response was due—Aspireistic responded to the Notice.⁶⁴ In its Response, Aspireistic stated that “[all foreign clients and upstream providers associated with the identified traffic have been permanently terminated” (even though Aspireistic had not identified any upstream providers in response to the ITG’s ten traceback requests). It also stated that it “has implemented strict blocking protocols to prevent any further transmission of suspicious or non-compliant traffic originating from international sources linked to the incident.”⁶⁵ Aspireistic stated that it had strengthened its “Know-Your-Customer (KYC)” and “Know-Your-Upstream (KYU)” [sic] procedures and deployed systems to proactively detect anomalous calling activity, and it described the signals on which those systems rely.⁶⁶ Aspireistic further stated that it had reinforced a zero-tolerance policy under which clients that engage in illegal robocalling face immediate termination and referral to relevant authorities.⁶⁷ Finally, Aspireistic committed to cooperating with the Commission and law enforcement, including by producing additional documentation on request.⁶⁸

15. The Response did not address any of the four deficiencies in Aspireistic’s deficient RMD certification.⁶⁹ Although Aspireistic updated its RMD certification on June 11, 2026, the same date the Bureau sent the Notice, the Company neither cured nor attempted to cure the four deficiencies identified in the Notice, nor did it correct its primary address. Instead, the Company only: (1) changed the name of its robocall mitigation contact from “Christopher Anderson” to “Ahsan Ahmad;” (2) changed the contact’s title from “Senior Manager” to “President;” (3) changed the contact’s department from “Operations” to “CEO;” (4) changed the contact’s email from “info@aspireistics.com” to “ahsan.ahmad@aspireistics.com,” and (5) signed declared, under penalty of perjury, that the information included in the certification was true and correct.⁷⁰ The Response also contained no reference to Callsto or any of the other providers listed in the Notice as possibly related to Aspireistic.

⁶² Envelope from Telecommunications Consumers Division, FCC Enforcement Bureau, to Christopher Anderson, Senior Manager, 1031 US 90 W Ste 3 141, Defuniak Springs, FL 32433 (postmarked June 11, 2026) (on file at EB-TCD-26-00040126) (Returned Envelope). Based on this information received from the U.S. Postal Service, we find that the DeFuniak Springs address listed in the Company’s RMD certification is invalid and needs to be corrected.

⁶³ Domestic Return Receipt (70041160000026197145), U.S. Postal Service (received June 16, 2026) (on file in EB-TCD-26-00040126).

⁶⁴ See Letter from Ahsan Ahmad, CEO, Aspireistic Inc., to FCC Enforcement Bureau (July 8, 2026) (on file at EB-TCD-26-00040126) (Response). Although dated July 8, 2026, the Bureau received the letter on July 7, 2026. See E-mail from Ahsan Ahmad, CEO, Aspireistic Inc., to Telecommunications Consumers Division, FCC Enforcement Bureau (July 7, 2026, at 5:26 PM ET) (on file at EB-TCD-26-00040126).

⁶⁵ See *id.*

⁶⁶ See *id.*

⁶⁷ See *id.*

⁶⁸ See *id.*

⁶⁹ See *id.*

⁷⁰ Compare Aspireistic Inc. (RMD0029141), Fed. Commc’ns Comm’n, Robocall Mitigation Database (filed Feb. 23, 2026) (February 2026 Aspireistic RMD Certification) (on file at EB-TCD-26-00040126), with Current Aspireistic RMD Certification, *supra* note 7.

III. DISCUSSION

A. Aspireistic May Be Subject to Mandatory Call Blocking

16. Aspireistic is in apparent violation of section 64.1200(n)(2) of the Commission's rules because the Response was insufficient. Specifically, the Notice required Aspireistic to investigate the traffic identified in the Notice and report the results of the investigation to the Bureau within 14 days of the date of the Notice.⁷¹ *First*, the Response asserts that the Company "permanently terminated" "[a]ll foreign clients and upstream providers associated with the identified traffic," but it has not provided any supporting evidence for that statement, or even identified the clients and upstream providers that it terminated, or the dates on which such terminations occurred. *Second*, the Company's assertion that "upstream providers [were] associated with the identified traffic" necessarily means that the Company is disputing that it originated all of the identified traffic. The Notice specifically stated that "[i]f 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." The Response fails to provide any explanation as to how the Company determined that it was not the originating provider for any of the identified traffic, or any evidence to support that assertion (including the names of the upstream providers).

17. Furthermore, Aspireistic submitted the Response 12 days late.⁷² Each day a recipient takes to adequately respond to a notification of suspected illegal traffic is a day that consumers might continue to be inundated with illegal traffic transmitted by its network. The Bureau has a strong interest in ensuring that responses are timely, so that it can confirm the illegal traffic has ceased. Aspireistic neither requested an extension nor offered any explanation for the untimeliness of its Response. In fact, its Response (which spanned less than two pages) describes no action taken by the Company that would have required extended time to complete.⁷³ And even if such actions had required more time, an untimely response was not the appropriate remedy. Therefore, we find the Response to be insufficient.

18. Given the insufficiency of the Response, the Bureau now issues this Order and directs Aspireistic to file a timely final response before the Bureau makes a final determination as to the Company's compliance with section 64.1200.⁷⁴ The Company's final response must include the specific information identified in paragraph 15 above that was not included in its Response. In addition, consistent with Aspireistic's commitment in its July 7, 2026, response to provide additional documentation upon request, the Company's final response must describe its relationships with Callsto, INFINITYSIP, and Conveytel, LLC, including whether the companies share common management and how each relationship was formed, and should enclose copies of any agreements memorializing those relationships. Failure to respond to this Order, or failure to submit a final response that includes all of the required information, will result in the Bureau issuing a final determination order.⁷⁵ The final determination order will be published in EB Docket No. 22-174 and serve as notification to all immediate

⁷¹ See Notice, *supra* note 2, at 7-8.

⁷² See Response, *supra* note 64.

⁷³ Some of the actions described in the Response (such as the deployment of a system to detect anomalous calling activity) also appear in the Company's robocall mitigation plan, dated several months earlier. Compare Current Aspireistic RMD Certification, *supra* note 7, with Response, *supra* note 64.

⁷⁴ 47 CFR § 64.1200(n)(2)(iii).

⁷⁵ *Id.* § 64.1200(n)(2)(iii).

downstream providers that they must block and cease accepting all traffic received directly from Aspireistic beginning 30 days after release of the final determination order.⁷⁶

B. Aspireistic's RMD Certification Remains Deficient

19. The Bureau finds that Aspireistic's RMD certification remains deficient in the respects identified in the Notice. *First*, Aspireistic has a DeFuniak Springs, Florida address listed as its primary address in its RMD certification.⁷⁷ However, the Company's filing with the Wyoming Secretary of State in June 2025 shows that the Florida address was replaced with a Sheridan, Wyoming address.⁷⁸ And the Company's Form 499 filing with the Commission in April 2025 lists an address in St. Petersburg, Florida.⁷⁹ Moreover, the United States Postal Service's attempt to deliver the Notice revealed that Aspireistic is "NOT KNOWN" at the DeFuniak Springs, Florida address.⁸⁰ We therefore find that the Company's primary address listed in the RMD is invalid. The Company filed its initial RMD certification in August 2025 and listed the DeFuniak Springs, Florida address, and has since updated its certification three times, most recently on June 11, 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 originates [carries or processes] are compliant with 47 CFR § 64.6301 [and 64.6302]."⁸¹ However, the Company indicates in its robocall 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.⁸² The Company did not certify to partial STIR/SHAKEN implementation, nor did it identify or claim an applicable exemption or extension of the STIR/SHAKEN implementation obligation in its RMD filing for the non-IP portions of its network.⁸³ *Third*, the Company's robocall mitigation plan fails to describe any procedures it has in place to know its upstream providers.⁸⁴ *Fourth*, the Company describes using "industry-standard call analytics and robocall scoring tools to assess traffic risk in real time," but the Company does not identify whether it uses any third-party analytics vendor(s) for the assessment, or the name(s) of such vendor(s) if it does.⁸⁵

20. Although Aspireistic updated its RMD certification on the date of the Notice, it failed to correct the deficiencies identified therein. The Bureau therefore directs Aspireistic to cure the deficiencies identified in the Notice and paragraph 18 above or explain why its certification should not be

⁷⁶ *Id.* § 64.1200(n)(3).

⁷⁷ Current Aspireistic RMD Certification, *supra* note 7.

⁷⁸ Compare Current Aspireistic RMD Certification, *supra* note 7, with Aspireistic Inc., 2025 Profit Corporation Annual Report, Wyo. Sec'y of State (June 30, 2025), <https://wyobiz.wyo.gov/business/FilingDetails.aspx?eFNum=143094001232004200217108251199164073082082179049>; see also 47 CFR § 64.6305(d)(4)(i), (e)(4)(i).

⁷⁹ See <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=837939>.

⁸⁰ Returned Envelope, *supra* note 62.

⁸¹ Current Aspireistic RMD Certification, *supra* note 7.

⁸² *Id.* Attach. ("Aspireistic Inc has not yet fully implemented STIR/SHAKEN due to existing non-IP portions of our voice network."); see also 47 CFR § 64.6305(d)(1)(i)-(iii), (e)(1)(i)-(iii).

⁸³ Current Aspireistic RMD Certification, *supra* note 7.

⁸⁴ *Id.*; see also 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii).

⁸⁵ Current Aspireistic RMD Certification, *supra* note 7, Attach. at 2; see also 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii).

removed from the RMD.⁸⁶ This Order affords Aspireistic a final opportunity to cure the deficiencies with its RMD certification. Alternatively, the Company may explain why its certification is not deficient.

21. Aspireistic shall file its response with the Bureau within 14 calendar days of the date of this Order to Show Cause.⁸⁷ Failure to respond and correct the deficiency or to provide a sufficient explanation for why Aspireistic should retain its certification in the RMD will result in removal of the certification and accompanying filing.⁸⁸ Removal of Aspireistic's certification from the RMD will require all voice service providers and intermediate providers to cease accepting calls directly from Aspireistic.⁸⁹ If Aspireistic is removed from the RMD, it shall not be permitted to refile unless and until both the Bureau and the Commission's Wireline Competition Bureau consent.

IV. ORDERING CLAUSES

22. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227(b), 251(e), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227(b), 251(e), 403 and sections 0.111, 0.311, 1.1, 1.102(b)(1), 64.1200(n)(2), and 64.6305 of the Commission's rules, 47 CFR §§ 0.111, 0.311, 1.1, 1.102(b)(1), 64.1200(n)(2), 64.6305, Aspireistic Inc. **SHALL FILE** any written final response to this Initial Determination Order and Order to Show Cause **within 14 calendar days** from the release date of this Initial Determination Order and Order to Show Cause.

23. Any response must be mailed to the Office of the Secretary, Federal Communications Commission, 45 L Street NE, Washington, DC 20554, ATTN: Enforcement Bureau – Telecommunications Consumers Division. The response must also be e-mailed to Daniel Stepanicich, Division Chief, Telecommunications Consumers Division, at Daniel.Stepanicich@fcc.gov, and David Konuch, Attorney Advisor, Telecommunications Consumers Division, at David.Konuch@fcc.gov.

24. **IT IS FURTHER ORDERED** that, pursuant to section 1.102(b)(1) of the Commission's rules, 47 CFR § 1.102(b)(1), this Initial Determination Order and Order to Show Cause **SHALL BE EFFECTIVE** upon release.

25. **IT IS FURTHER ORDERED** that copies of this Initial Determination Order and Order to Show Cause shall be filed in EB Docket No. 22-174 and sent by certified mail, return receipt requested, to Ahsan Ahmad, President, Aspireistic Inc., ahsan.ahmad@aspireistics.com; Aspireistic Inc., c/o Washington DC Registered Agent LLC, 1717 N Street NW, Suite 1, Washington, DC 20036; and Aspireistic Inc., c/o Registered Agents Inc., 30 N. Gould St., Suite R, Sheridan, WY 82801.

⁸⁶ See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60; see also *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (“Enforcement Actions may include, among others, removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing . . .”).

⁸⁷ See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

⁸⁸ See *id.*

⁸⁹ 47 CFR § 64.6305(g). Notwithstanding this requirement, “[a] provider may not block a voice call under any circumstances if the call is an emergency call placed to 911” and “must make all reasonable efforts to ensure that it does not block any calls from public safety answering points and government emergency numbers.” *Id.* § 64.6305(g)(5).

FEDERAL COMMUNICATIONS COMMISSION

Hunter P. Deeley
Chief
Enforcement Bureau