

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|                                  |   |                      |
|----------------------------------|---|----------------------|
| In the Matter of                 | ) |                      |
|                                  | ) | EB-TCD-26-00040954   |
| Mexico IP Phone LLC <sup>1</sup> | ) |                      |
|                                  | ) | EB Docket No. 22-174 |
|                                  | ) |                      |

**REMOVAL ORDER**

**Adopted: October 16, 2026**

**Released: October 16, 2026**

By the Chief, Enforcement Bureau:

**I. INTRODUCTION**

1. By this Removal Order (Order), the Enforcement Bureau (Bureau) of the Federal Communications Commission (Commission or FCC) removes the certification of Mexico IP Phone LLC (Mexico IP or Company) from the Robocall Mitigation Database (RMD). On June 11, 2026, the Bureau issued an Order to Show Cause (Show Cause Order), finding that the Company's recertification of its RMD certification without required information<sup>2</sup> was apparently intentional and undertaken to avoid scrutiny while advancing an illegal scheme to obtain direct access to phone numbers.<sup>3</sup> In addition, the Company accepted and transmitted high-volume illegal and/or suspicious call traffic from providers who failed to respond to tracebacks in violation of Commission mandates, thus enabling those calls to reach U.S. consumers.<sup>4</sup> The Show Cause Order directed the Company to respond, explaining why its certification should not be removed from the RMD, and gave the Company an opportunity to cure the willfully deficient certification by responding fully to the issues raised in the Show Cause Order or explain why the certification is not willfully deficient.<sup>5</sup> The Company failed to adequately respond to the Show Cause Order. **By this Order, the Bureau removes the certification of Mexico IP from the RMD and requires all intermediate providers and voice service providers to cease accepting all calls directly from the Company.**<sup>6</sup> The Company shall not re-file an RMD certification without the prior

<sup>1</sup> The Company is registered as "Mexico IP Phone LLC" with the New Mexico Secretary of State, but styles itself as "MEXICO IP PHONE" in the RMD. *Contrast Business Search*, New Mexico Sec'y of State, <https://enterprise.sos.nm.gov/search/business> (search in search bar for "Mexico IP Phone LLC") (last visited June 7, 2026) (showing registration of "Mexico IP Phone LLC" in New Mexico), *with* Mexico IP Phone (RMD0024474), Fed. Commc'ns Comm'n, Robocall Mitigation Database, [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=77b40c691b5e5650c2ae0d47624bcb6c6&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=77b40c691b5e5650c2ae0d47624bcb6c6&view=sp) (last updated June 12, 2026) (showing filing of "MEXICO IP PHONE" in the RMD) (Current Mexico IP RMD Certification).

<sup>2</sup> See generally 47 CFR § 64.6305(d)-(f) (RMD certification requirements for voice service providers, gateway providers, and non-gateway intermediate providers).

<sup>3</sup> *Mexico IP Phone LLC*, Order to Show Cause, No. DA 26-574, 2026 WL 1907622, at \*5-6, paras. 15-16 (EB June 11, 2026) (Show Cause Order).

<sup>4</sup> *Id.* at \*3, para. 8.

<sup>5</sup> *Id.* at \*6, paras. 17-18.

<sup>6</sup> See 47 CFR § 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, 2604-05, para. 62 (2023) (*Sixth Caller ID*

approval of the Bureau and the Commission's Wireline Competition Bureau (WCB or Wireline Bureau).

## II. BACKGROUND

### A. RMD Certification Rules and Removal Procedures

2. The FCC established the RMD in 2020 to promote transparency and effective robocall mitigation.<sup>7</sup> Voice service providers, gateway providers, and non-gateway intermediate providers must file certifications in the RMD.<sup>8</sup> RMD certifications must describe the specific reasonable steps the provider is taking to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program.<sup>9</sup> RMD certifications must include a commitment to respond to all traceback requests from the Commission and to cooperate with the Commission in investigating and stopping any illegal robocallers that use its service to originate, carry, or process calls.<sup>10</sup> RMD certifications must state whether the provider has, at any time in the prior two years, 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 provider transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing.<sup>11</sup> If so, the certification must provide a description of any such action or investigation, including all law enforcement or regulatory agencies involved, the date that any action or investigation was commenced, the current status of the action or investigation, a summary of the findings of wrongdoing made in connection with the action or investigation, and whether any final determinations have been issued.<sup>12</sup> When completing the certification form in the RMD, providers must identify their "[p]rincipals, affiliates, subsidiaries, and parent companies in sufficient detail to facilitate the Commission's ability to determine whether the provider has been prohibited from filing in the Robocall Mitigation Database."<sup>13</sup> Each provider must identify at least one principal, who must be an individual.<sup>14</sup>

*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).

<sup>7</sup> *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*).

<sup>8</sup> 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 47 CFR § 64.6300(o) that applies to the RMD requirements in 47 CFR § 64.6305. The terms "gateway provider" and "non-gateway intermediate provider" are defined in 47 CFR § 64.6300(d) and (i).

<sup>9</sup> 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

<sup>10</sup> 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(iii).

<sup>11</sup> 47 CFR § 64.6304(d)(2)(iv), (e)(2)(iv), (f)(2)(iv).

<sup>12</sup> 47 CFR § 64.6305(d)(2)(iv), (e)(2)(iv), (f)(2)(iv).

<sup>13</sup> See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2597, para. 46 & n.176 (delegating authority to the Wireline Bureau to determine the form and format of RMD filings, including as it pertains to disclosure of enforcement actions and principals and affiliates). See also *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, WC Docket No. 17-97, Public Notice, 39 FCC Rcd 383, 386-87 n.20 (WCB Jan. 25, 2024) (RMD Public Notice).

<sup>14</sup> See *Sixth Caller ID Authentication Order*, 36 FCC Rcd at 2597, para. 46 ("We also adopt our proposal to require providers to submit information regarding their principals, affiliates, subsidiaries, and parent companies in sufficient detail to facilitate the Commission's ability to determine whether the provider has been prohibited from filing in the [RMD]."); see also *id.* at 2609, para. 71, n.256 ("We expect that owners, directors, officers, and principals [either individuals or entities], whether or not they have control of the entity, have influence, management, or supervisory responsibility for the entity subject to revocation.") (internal citation omitted); *Robocall Mitigation Database Frequently Asked Questions for Filers*, Fed. Commc'ns Comm'n (Jan. 20, 2026),

(continued....)

An officer of the provider filing a certification in the RMD must declare, under penalty of perjury, that the information included in the certification is true and correct.<sup>15</sup> The submission of false or inaccurate information makes a certification deficient and may result in an enforcement action against the filer, including removal of the certification from the RMD.<sup>16</sup>

3. The Commission may remove a provider's certification from the RMD that it finds "deficient in some way."<sup>17</sup> Generally, RMD removal is a three step process.<sup>18</sup> However, when a provider willfully violates the Commission's rules, its certification may be removed from the RMD under a two-step, expedited procedure.<sup>19</sup> An action "is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements."<sup>20</sup> First, the Bureau will give notice

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<https://www.fcc.gov/sites/default/files/rmd-faq.pdf> (RMD FAQs) (explaining that "[w]hile a filer may not have any affiliates, subsidiaries, or parent companies, every RMD filer must identify at least one principal, who must be an individual, on the RMD submission form to provide the Commission with sufficient detail regarding the filer's ownership and management.").

<sup>15</sup> 47 CFR § 64.6305(d)(3)(ii), (e)(3)(ii), (f)(3)(ii); *id.* § 1.16.

<sup>16</sup> See *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (noting that if a certification "is deficient in some way," the Commission may take enforcement action as appropriate, including "removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing"); *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, 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, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, 37 FCC Rcd 6865, 6882, para. 40 (2022) (*Gateway Provider Order*) (discussing RMD enforcement actions against gateway providers); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 57 (discussing RMD enforcement actions against non-gateway intermediate providers). The Commission may also impose a forfeiture on filers that submit false or inaccurate information in the RMD. See *Improving the Effectiveness of the Robocall Mitigation Database, Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, WC Docket No. 24-213, MD Docket No. 10-234, Report and Order, 40 FCC Rcd 599, 606, para. 18 (2025) (adopting a \$10,000 base forfeiture for submitting false or inaccurate information to the RMD); see also *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2590, para. 31 ("[A] provider's program is 'sufficient if it includes detailed practices that can reasonably be expected to significantly reduce' the carrying or processing (for intermediate providers) or origination (for voice service providers) of illegal robocalls. Each provider 'must comply with the practices' that its program requires, and its program is insufficient if the provider 'knowingly or through negligence' carries or processes calls (for intermediate providers) or originates (for voice service providers) unlawful robocall campaigns." (citations omitted)).

<sup>17</sup> *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83; *Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40; *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

<sup>18</sup> See *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

<sup>19</sup> *Id.* at 2604-05, para. 62 (describing the two-step expedited procedure and explaining that it applies to situations where a provider "has 'willfully' violated its Robocall Mitigation Database filing obligations within the meaning of that term in section 9(b) of the Administrative Procedure Act (APA), 5 U.S.C. § 558(c), which applies to revocation of licenses"); see also *chase tech llc*, EB-TC-D-24-00037629, Order, 40 FCC Rcd 7204 (EB 2025) (*Chase Tech Order*) (removing a provider from the RMD under the two-step, expedited procedure for submitting false data in its RMD certification). In the *Sixth Caller ID Authentication Order*, the Commission concluded that where a provider's certification is facially deficient—that is, it fails to submit any information regarding the "specific reasonable steps" it is taking to mitigate illegal robocalls—it has "willfully" violated the RMD rules and expedited removal is warranted. *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 61. Although, in that *Order*, the Commission applied its willful violation analysis to facially deficient certifications specifically, it did not preclude a determination that other types of deficiencies could be considered willful violations.

<sup>20</sup> *Coosemans Specialties, Inc.*, 482 F.3d at 567 (D.C. Cir. 2007) ("[A]n action [under 5 U.S.C. § 558(c)] is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory

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to the provider, informing it that its certification is deficient and represents a willful violation, explain the nature of the deficiency and the willful violation, and allow 10 days for the provider to cure the deficiency or explain why its certification is not deficient.<sup>21</sup> *Second*, if the provider fails to cure or establish that there is no deficiency within the 10-day period, the Bureau will release an order removing the provider's certification from the RMD.<sup>22</sup>

4. Under the Commission's rules, intermediate providers and voice service providers shall accept calls directly from a domestic voice service provider, gateway provider, or non-gateway intermediate provider only if that provider's certification appears in the RMD.<sup>23</sup> Removal of a provider's certification from the RMD therefore requires all intermediate providers and voice service providers to cease accepting all calls directly from the provider.<sup>24</sup>

#### **B. Direct Access to Numbers Application Process**

5. The Commission has exclusive jurisdiction over those portions of the North American Numbering Plan (NANP) related to the United States.<sup>25</sup> The NANP Administrator (NANPA) is the impartial, non-government entity that administers number resources in accordance with Commission rules and regulations.<sup>26</sup> In 2015, the Commission established a multi-step process for interconnected Voice over Internet Protocol (VoIP) providers to obtain United States telephone numbers directly from the NANPA.<sup>27</sup> In 2023, the Commission updated and enhanced its rules governing the VoIP numbering authorization process for direct access to numbering resources, including adding robocall-related and foreign ownership certification requirements.<sup>28</sup> The Commission continues to strengthen these rules in order to provide a critical defense against bad actors seeking to access United States numbering resources, most recently in December 2025 by taking action to extend the anti-robocalling and other compliance requirements to VoIP providers with existing direct access to numbers.<sup>29</sup>

6. A provider seeking direct access to numbers from the NANPA must first obtain Commission authorization.<sup>30</sup> Among other requirements, the application for VoIP numbering

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requirements.”) (quoting *Finer Foods Sales Co. v. Block*, 708 F.2d 774, 778 (D.C. Cir. 1983)). See *Chase Tech Order*, 40 FCC Rcd at 7206, para. 7 (finding a provider's actions willful where it submitted false information to the RMD).

<sup>21</sup> *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2605, para. 62.

<sup>22</sup> *Id.*

<sup>23</sup> 47 CFR § 64.6305(g). However, providers may not block emergency calls placed to 911 and must make all reasonable efforts not to block calls from public safety answering points and government emergency numbers. See *id.* § 64.6305(g)(5).

<sup>24</sup> See *id.*

<sup>25</sup> 47 U.S.C. 251(e)(1).

<sup>26</sup> 47 CFR § 52.13(a)-(d).

<sup>27</sup> *Numbering Policies for Modern Communications et al.*, CC Docket Nos. 99-200, 95-116, and 01-92; WC Docket Nos. 13-97, et al., Report and Order, 30 FCC Rcd 6839 (2015) (*First Direct Access Order*).

<sup>28</sup> *Numbering Policies for Modern Communications et al.*, IB Docket No. 16-155; WC Docket Nos. 13-97 et al., , Second Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd 8951, 8953 para. 3 (2023) (*Second Direct Access Order*).

<sup>29</sup> See *Numbering Policies for Modern Communications et al.*, WC Docket Nos. 13-97 et al, Third Report and Order and Third Further Notice of Proposed Rulemaking, 40 FCC Rcd 10481, 10482-83, para. 3 (2025) (amending the Commission's rules to require all pre-existing authorization holders to comply with the requirements adopted in the *Second Direct Access Order*; however, compliance with those amendments is delayed pending approval by the Office of Management and Budget).

<sup>30</sup> *First Direct Access Order*, 30 FCC Rcd at 6849, para. 22.

authorization must be filed in a designated non-docketed inbox in the Commission's Electronic Comment Filing System and be accompanied by an application fee.<sup>31</sup> The applicant must also certify that it "will not use the numbers obtained pursuant to an authorization . . . to knowingly transmit, encourage, assist, or facilitate illegal robocalls, illegal spoofing, or fraud, in violation of robocall, spoofing, and deceptive telemarketing obligations," and "that the applicant has fully complied with all applicable STIR/SHAKEN caller ID authentication and robocall mitigation program requirements and filed a certification in the Robocall Mitigation Database."<sup>32</sup> Wireline Bureau staff review the application for sufficiency and then, if it satisfies initial review, release an Accepted-For-Filing Public Notice in a case-specific docket created for the application, seeking comment on the application.<sup>33</sup> Under this streamlined process, the application is only deemed granted on the 31st day after the Accepted-For-Filing Public Notice is released, unless the Wireline Bureau notifies the applicant that the grant will not be automatically effective.<sup>34</sup> If the authorization is granted, the Wireline Bureau releases a public notice announcing the effective date the authorization is granted.<sup>35</sup> Once the authorization is granted, the provider may then apply to the NANPA for direct access to numbers.

### C. Mexico IP Phone and its RMD Certification

7. Mexico IP is a voice service provider.<sup>36</sup> Mexico IP first filed a certification in the RMD on December 5, 2024, and recertified its certification on February 24, 2026.<sup>37</sup> In the February 24, 2026 version of its certification, when directed to identify its "principals, affiliates, subsidiaries, and parent companies," the Company only identified "Mexico IP Phone."<sup>38</sup> Additionally, the company stated it was not the subject of a Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing in the prior two years.<sup>39</sup> Hemant Kumar Bharti (Bharti), Mexico IP's CEO, signed the certification declaring under penalty of perjury that the information was correct and true.<sup>40</sup>

8. On August 7, 2025, the Anti-Robocall Multistate Litigation Task Force (Task Force) sent Bharti a letter (Task Force Letter) notifying Mexico IP that the Task Force found the Company to be immediately downstream of non-responsive voice service providers in at least 40 tracebacks of illegal or

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<sup>31</sup> 47 CFR § 52.15(g)(3)(iii); *First Direct Access Order*, 30 FCC Rcd at 6857, para. 38. The other application requirements are enumerated in section 52.15(g)(3)(ii) of the Commission's rules. 47 CFR § 52.15(g)(3)(ii); see *First Direct Access Order*, 30 FCC Rcd at 6858-63, paras. 42-50.

<sup>32</sup> See 47 CFR § 52.15(g)(3)(ii)(C)-(D); *Second Direct Access Order*, 38 FCC Rcd at 8957-60, paras. 13-15.

<sup>33</sup> 47 CFR § 52.15(g)(3)(iv); *First Direct Access Order*, 30 FCC Rcd at 6858, para. 39.

<sup>34</sup> 47 CFR § 52.15(g)(3)(iv); *First Direct Access Order*, 30 FCC Rcd at paras. 39-40. If an application discloses that the applicant has reportable ownership by a foreign person or entity, the Wireline Bureau is required to remove the application from streamlined processing. See 47 CFR § 52.15(g)(v). The Wireline Bureau may also remove an application from streamlined processing at its discretion for other reasons, such as if the applicant fails to respond promptly to Commission inquiries. See *id.*

<sup>35</sup> See, e.g., *Notice of Interconnected VoIP Numbering Authorizations Granted*, WC Docket No. 25-204, Public Notice, DA 26-162 (WCB Feb. 17, 2026).

<sup>36</sup> Current Mexico IP RMD Certification. Although Mexico IP certifies in the RMD to being only a voice service provider (and not to being a gateway provider or non-gateway intermediate provider), as noted in paragraph 8 below, the Company has repeatedly accepted traffic from domestic voice service providers, *i.e.*, carried traffic as a non-gateway intermediate provider.

<sup>37</sup> Mexico IP Phone (RMD0024474), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Feb. 24, 2026), (on file in EB-TCD-26-00040954) (February 2026 Mexico IP RMD Certification).

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> *Id.*

suspicious calls.<sup>41</sup> The Task Force Letter stated that “Mexico IP accepted and transmitted high-volume illegal and/or suspicious call traffic—which has reached U.S. consumers and, presumably, generated revenue for Mexico IP—from providers that have failed to respond to traceback requests in contravention of the FCC’s mandates.”<sup>42</sup> The letter went on to state that “Mexico IP is likely causing and/[or] facilitating significant volumes of illegal [or] suspicious robocalls to ultimately reach U.S. consumers[.]”<sup>43</sup> On December 2, 2025, the Bureau found that Mexico IP was “closely affiliated” with another voice service provider, SK Teleco LLC (SK Teleco) “in transmitting Walmart impersonation robocalls” in April and May 2025.<sup>44</sup>

#### **D. Mexico IP’s Attempt to Seek Direct Access to Numbers**

9. On February 4, 2026, Mexico IP filed a document titled “Application for Authorization to Obtain Direct Access to Telephone Numbers” (Application) directly into WC Docket No. 13-97, a rulemaking docket.<sup>45</sup> The Commission’s Electronic Comment Filing System (ECFS) lists “HEMANT KUMAR BHARTI” as the Application’s sole author.<sup>46</sup> The company did not file the Application in the designated non-docketed inbox for VoIP numbering authorizations or pay the required filing fee. The Company submitted no other documents or information to the Commission or Wireline Bureau and the Wireline Bureau had no communications with the Company. The Wireline Bureau took no action with regards to the Application and did not release an Accepted-For-Filing Public Notice for Mexico IP because the Application was not properly filed.

10. That same day, Bharti emailed NANPA’s “NANPA Support” email address to begin the process of obtaining numbers.<sup>47</sup> In response, NANPA Support informed Bharti that he had submitted incorrect documentation, and that he needed to provide a letter from NECA showing the Company’s registration number (NECA Letter), and the “VoIP Authorization Granted” public notice showing the Commission had authorized the Company to obtain numbers.<sup>48</sup> In response, Bharti provided a different

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<sup>41</sup> Letter from Jeff Jackson, Attorney General, and Tracy Nayer, Special Deputy Attorney General, North Carolina Department of Justice, to Hemant Kumar Bharti, CEO, Mexico IP Phones LLC, at 4 (Aug. 7, 2025) (on file in EB-TCD-26-00040954) (Task Force Letter), <https://ncdoj.gov/wp-content/uploads/2025/08/State-AG-Task-Force-NOTICE-Letter-to-Mexico-IP-Aug-2025.pdf>. “The Anti-Robocall Multistate Litigation Task Force is a 51-member bipartisan collective of State Attorneys General, led by the Attorneys General of Indiana, North Carolina, and Ohio, which is focused on actively investigating and pursuing enforcement actions against various entities in the robocall ecosystem that are identified as being responsible for significant volumes of illegal and fraudulent robocall traffic routed into and across the county.” *Id.* at 1, n.1.

<sup>42</sup> Task Force Letter, at 4.

<sup>43</sup> *Id.*

<sup>44</sup> Letter from Patrick Webre, Acting Chief, Enforcement Bureau, FCC, to Saurabh Rajput, CEO, SK Teleco LLC, at 3 (Dec. 2, 2025) (on file in EB-TCD-26-00040498) (SK Teleco Letter), <https://docs.fcc.gov/public/attachments/DOC-415638A1.pdf>.

<sup>45</sup> Mexico IP Phone LLC, Application For Authorization to Obtain Direct Access to Telephone Numbers, WC Docket No. 13-97 (Feb. 4, 2026)(on file in EB-TCD-26-00040954) (Mexico IP Application), <https://www.fcc.gov/ecfs/document/102042637904869/1>.

<sup>46</sup> Filing Detail, Mexico IP Phone, Fed. Commc’ns Comm’n, ECFS, <https://www.fcc.gov/ecfs/search/search-filings/filing/102042637904869>, last visited Sept. 24, 2026; *see also* Mexico IP Phone ECFS Screenshot 2026-09-24 101026 (on file in EB-TCD-26-00040954).

<sup>47</sup> Email from Hemant Bharti (using [admin@mexicoipphone.com](mailto:admin@mexicoipphone.com)), CEO, Mexico IP Phone, to [Support@nanpa.com](mailto:Support@nanpa.com) (Feb. 4, 2026, 11:27 EST). The email address [admin@mexicoipphone.com](mailto:admin@mexicoipphone.com) appears on the recipient’s email as “Hemant Bharti.” Bharti’s email sought access to “NAS,” an acronym for NANPA Administrative System, used in obtaining numbers from the NANPA.

<sup>48</sup> Email from Support NANPA to Hemant Bharti (Feb. 4, 2026 11:36 EST) (on file in EB-TCD-26-00040954) (“Hemant, . . . NANPA requires both the NECA letter and the FCC VoIP Authorization Granted document,” and requesting that both documents be submitted in the same email).

document, the Company's Form 499, instead of the "VoIP Authorization Granted" public notice.<sup>49</sup> NANPA Support then replied, "Hemant, [t]he FCC499 form you attached is not the FCC VoIP Authorization Granted document NANPA requires," and directed Bharti to the Commission web site listing this information, the "VoIP Numbering Authorization Grants page."<sup>50</sup>

11. Two days later, on February 6, 2026, Bharti emailed NANPA support attaching a document purporting to be a "Notice of Interconnected VoIP Numbering Authorizations Granted," which appeared to be a Commission public notice announcing a grant of direct access authorization to the Company (Purported Notice).<sup>51</sup> The Purported Notice was numbered "DA 26-8" and stated it was released in WC Docket No. 13-97 on February 5, 2026.<sup>52</sup> The Purported Notice also stated the effective grant date for Mexico IP's authorization was February 5, 2026—the day after Bharti had filed the Application.<sup>53</sup>

12. On February 25, 2026, NANPA's Vice President, Florence Weber, contacted the Wireline Bureau enclosing the Purported Notice, the Application, and a letter from NECA that Bharti had sent to NANPA, seeking to "confirm" Mexico IP's status as an entity approved for direct numbering access.<sup>54</sup> Weber wrote:

Hermant Bharti with Mexico IP Phone provided the attached documents [Purported Notice, Application, and NECA Letter] as part of his new user registration request.

In our research, [NANPA] couldn't verify that Mexico IP Phone received their VoIP [numbering] authorization. Can you confirm their status?<sup>55</sup>

Wireline Bureau Staff replied:

They [Mexico IP] have not been approved and they have never even applied. The public notice attached appears to be falsified.<sup>56</sup>

13. The Wireline Bureau never issued the Purported Notice.<sup>57</sup> However, the Wireline Bureau did release a "Notice of Interconnected VoIP Numbering Authorization Granted" numbered "DA 26-8" in WC Docket No. 25-118 on January 2, 2026, that granted a VoIP numbering authorization to a company called DayStarr, LLC (DayStarr Notice) with an effective date of January 2, 2026.<sup>58</sup> The text of the Purported Notice and the DayStarr Notice are identical except for Mexico IP's name, the Commission docket numbers supposedly assigned to Mexico IP's Application, and the purported effective grant and

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<sup>49</sup> Email from Hemant Bharti, CEO, Mexico IP Phone, to [Support@nanpa.com](mailto:Support@nanpa.com) (Feb. 4, 2026, 11:50 EST).

<sup>50</sup> Email from Support NANPA to Hemant Bharti (Feb. 4, 2026, 11:55 EST) (on file in EB-TCD-26-00040954).

<sup>51</sup> Email from Hemant Bharti, CEO, Mexico IP Phone, to [Support@nanpa.com](mailto:Support@nanpa.com) (Feb. 6, 2026, 7:21 EST).

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

<sup>54</sup> Email from Florence Weber, Vice President, NANPA, to Christi Shewman, Attorney Advisor, Wireline Bureau, FCC (Feb. 25, 2026 14:06 EST)(Weber Email to Wireline Bureau).

<sup>55</sup> *Id.*

<sup>56</sup> Email from Christi Shewman, Attorney Advisor, Wireline Bureau, FCC, to Florence Weber, Vice President, NANPA (Feb. 25, 2026 13:14 EST)(on file at EB-TCD-26-00040954).

<sup>57</sup> See *id.* In addition, as described in Section II.B above, the Wireline Bureau's procedures for processing direct access applications would never result in an application being granted the day after it was filed, even under the streamlined procedure.

<sup>58</sup> *Notice of Interconnected VoIP Numbering Authorizations Granted*, WC Docket No. 25-118, DA 26-8 (WCB Jan. 2, 2026) (DayStarr Notice). DayStarr is not related to Mexico IP in any way.

release dates.<sup>59</sup> The Wireline Bureau concluded that Mexico IP had apparently created a sham numbering authorization for itself using the DayStarr Notice as a model,<sup>60</sup> and referred the matter to the Enforcement Bureau for further investigation.<sup>61</sup>

#### **E. The Mexico IP Order to Show Cause**

14. The Show Cause Order discussed the Company's conduct and identified apparent deficiencies in the Company's RMD certification. *First*, it found that "[t]he totality of the circumstances suggest that Mexico IP's 'Application' and the Purported Notice were part of an intentional scheme to circumvent the Commission's defenses against robocallers gaining direct access to numbers."<sup>62</sup> *Second*, it found Mexico IP's RMD certification was "apparently deficient because the Company failed both to identify an individual principal of the Company, and that it was the subject of a law enforcement investigation in the past two years."<sup>63</sup> *Third*, the Show Cause Order found "Mexico IP intentionally recertified its RMD certification with missing information in order to advance its direct access to numbers scheme,"<sup>64</sup> *i.e.*, by "avoid[ing] any red flags that might have been raised over its history of accepting and transmitting illegal traffic."<sup>65</sup> The Show Cause Order directed the Company to respond, explaining why its certification should not be removed from the RMD, and gave the Company an opportunity to cure the willfully deficient certification by fully responding to the issues raised in the Order or explain why the certification is not willfully deficient.<sup>66</sup>

#### **F. Mexico IP's Response**

15. In the Mexico IP Response Bharti acknowledged on behalf of the Company "the deficiencies identified in its [RMD] certification" and "represent[ed] that it is acting in good faith to correct" them.<sup>67</sup> Specifically, "the Company acknowledge[d] that its RMD certification failed to identify an individual principal as required"<sup>68</sup> and stated that it "has corrected this information and provided the required disclosure."<sup>69</sup> The Company updated its RMD filing on June 12, 2026 to identify "Hemant Kumar Bharti" as its principal and to disclose the Task Force investigation.<sup>70</sup> Bharti further "acknowledge[d] that the August 7, 2025 Anti-Robocall Multistate Litigation Task Force Notice should have been disclosed in its certification," and then revised its certification to disclose the Task Force

<sup>59</sup> Compare Purported Notice, with DayStarr Notice.

<sup>60</sup> Email from Jordan Reth, Attorney Advisor, Wireline Bureau, FCC to Kalun Lee, Supervisory Attorney Advisor, FCC, (March 12, 2026 14:41 EST) linking document (WCB Referral), at 2 ("To reiterate: no such grant [of numbering authorization to Mexico IP] was made. Furthermore, the [Purported Notice] uses the Delegated Authority number of a previously released public notice granting authority to DayStarr, LLC on January 2, 2026, which appears to be the base document that was used for the fraudulent one presented by Mexico IP").

<sup>61</sup> *Id.* The WCB Referral also noted that SK Teleco filed a similar numbering request in June 2025, and Carrier Upgrade LLC filed a request for numbering authorization "in a similar letter format" as Mexico IP on February 5, 2026, the same day as the "effective grant" date of Mexico IP's Purported Notice.

<sup>62</sup> Show Cause Order, at \*5, para. 14.

<sup>63</sup> *Id.* at \*4, para. 11.

<sup>64</sup> *Id.* at \*8, para. 16.

<sup>65</sup> *Id.* at \*5-6, paras. 15-16.

<sup>66</sup> *Id.* at \*6, para. 17-18.

<sup>67</sup> E-mail from Hemant Kumar Bharti, Chief Executive Officer, Mexico IP, to Daniel Stepanicich, Division Chief, Telecommunications Consumers Division, FCC Enforcement Bureau (June 12, 2026, at 08:28 ET) (on file at EB-TCD-26-00040954) (Mexico IP Response).

<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> See Current Mexico IP RMD Certification.

Letter.<sup>71</sup> In response to the allegations concerning access to numbering, Bharti explained that the Company had “engaged a remote third-party freelancer to assist with regulatory and compliance-related matters”<sup>72</sup> and that “Management’s understanding was that any applications, filings, or requests for authorization would be pursued through lawful FCC processes and procedures,” and that “[t]he Company did not authorize any person to create, alter, falsify, or misrepresent an FCC authorization document.”<sup>73</sup>

16. As for the falsified numbering Application, Bharti stated that Mexico IP “recognizes that its oversight of third-party compliance assistance was insufficient and has implemented corrective measures, including direct management review of regulatory filings and verification of all future submissions before they are provided to any governmental agency or industry administrator.”<sup>74</sup> Bharti stated that the “individual who had been assisting with regulatory matters is no longer associated with the Company and no longer performs any work on its behalf.”<sup>75</sup>

17. In addition to admitting that the Company (or someone acting on its behalf) filed the false numbering Application, Bharti provided no explanation for failing to disclose in the Company’s RMD certification that the Company was the target of the Task Force investigation for accepting and transmitting illegal or suspicious robocall traffic to U.S. consumers. Rather, Bharti stated that, “[t]o the Company’s knowledge, no final determination or enforcement order has been issued regarding the matters described in [the Task Force Letter].”<sup>76</sup>

18. Following the Mexico IP response, the Bureau sought further information from Mexico IP, specifically, the freelancer’s identity, how the company located them, and Mexico IP’s method of payment.<sup>77</sup> Mexico IP replied, again via an email from Bharti, that the freelancer was named “Lance Lee,” an individual who “represented that he was located in Malaysia,”<sup>78</sup> and that Mexico IP had paid the freelancer through “Crypto Currency Payment as he insisted on paying through that only.”<sup>79</sup> The Company admitted that it had no access to the Fiverr message history or any other contact information for the freelancer, such as “a current email address, telephone number, website, or LinkedIn profile.”<sup>80</sup> Even “[t]he Fiverr account through which he was engaged is no longer accessible to [the Company].”<sup>81</sup>

19. The Bureau also invited Bharti to appear in person to respond to further questions.<sup>82</sup> Despite listing a New Mexico address as the contact address for himself (the Company’s robocall mitigation contact) and as the Company’s primary business address in its RMD filing, Bharti responded that, “as a small company, international travel [to the FCC’s headquarters in Washington, DC] may

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<sup>71</sup> Mexico IP Response, *supra* note 67; *see also* Current Mexico IP RMD Certification.

<sup>72</sup> *Id.*

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> *Id.*

<sup>76</sup> Mexico IP Response, *supra* note 67.

<sup>77</sup> *See* E-mail from Daniel Stepanicich, Division Chief, Telecommunications Consumers Division, FCC Enforcement Bureau, to Hemant Kumar Bharti, Chief Executive Officer, Mexico IP (June 26, 2026, at 14:20 ET) (on file at EB-TCD-26-00040954) (EB Supplemental Request).

<sup>78</sup> E-mail from Hemant Kumar Bharti, Chief Executive Officer, Mexico IP, to Daniel Stepanicich, Division Chief, Telecommunications Consumers Division, FCC Enforcement Bureau (June 29, 2026, at 09:47 ET) (on file at EB-TCD-26-00040954) (Mexico IP Supplemental Response).

<sup>79</sup> *Id.*

<sup>80</sup> *Id.*

<sup>81</sup> *Id.*

<sup>82</sup> *See* EB Supplemental Request, *supra* note 77.

require advance scheduling and could present logistical and financial challenges.”<sup>83</sup>

### III. DISCUSSION

20. The Show Cause Order identified two deficiencies in Mexico IP’s RMD certification and related acts and omissions showing willful misconduct that would result in removal of the Company’s certification from the RMD.<sup>84</sup> *First*, Mexico IP failed to identify an individual principal of the Company as it only named its corporate name.<sup>85</sup> *Second*, the Company failed to disclose on its certification that it was the subject of a robocalling investigation launched by the Task Force.<sup>86</sup> Mexico IP has facially corrected these two deficiencies. Its certification now identifies its CEO, Hemant Kumar Bharti, as the principal and it identifies the Task Force letter as a prior enforcement action or investigation.<sup>87</sup>

21. The Show Cause Order, however, described how these RMD deficiencies were part of a larger scheme to deceive the Commission and the public to obtain access to numbering resources.<sup>88</sup> The Company submitted an “Application” for numbering access on February 5, 2026, without following any of the procedural requirements for a properly filed application.<sup>89</sup> The Company then altered the DayStarr Notice to create a document that appeared to grant numbering access to Mexico IP and submitted the Purported Notice to the NANPA on February 25, 2026.<sup>90</sup> The Commission’s rules require applicants for VoIP numbering authorizations to certify that they will not use numbers to knowingly transmit encourage, assist, or facilitate illegal robocalls.<sup>91</sup> Applicants must also certify that they have filed in the RMD.<sup>92</sup> By recertifying its RMD certification on February 24, 2026 without the required information about its principals and prior law enforcement actions, Mexico IP apparently sought to satisfy the RMD certification requirement while avoiding any red flags that might have been raised over its history of accepting and transmitting illegal traffic.<sup>93</sup> The timing of Mexico IP’s RMD recertification—less than a month after filing “the Application” and brazenly submitting the forged Purported Notice to NANPA—suggests the Company’s actions were part of an intentional scheme and not coincidental.<sup>94</sup>

22. Mexico IP failed to sufficiently address these allegations in its Response. The Company blamed submission of the false numbering Application on a purported Malaysian freelancer, “Lance Lee,” whom the Company found through digital marketplace Fiverr.<sup>95</sup> Mexico IP claimed it paid “Lance Lee” in cryptocurrency.<sup>96</sup> As its only defense, Mexico IP stated that it “recognizes that its oversight of third-party compliance assistance was insufficient and has implemented corrective measures, including direct management review of regulatory filings and verification of all future submissions before they are

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<sup>83</sup> Mexico IP Phone Supplemental Response, *supra* note 78.

<sup>84</sup> Show Cause Order at \*4, para. 11

<sup>85</sup> *Id.*

<sup>86</sup> Show Cause Order at \*4, para. 12.

<sup>87</sup> Current Mexico IP RMD Certification.

<sup>88</sup> Show Cause Order at \*5, paras. 13-14.

<sup>89</sup> *Id.* at para. 14.

<sup>90</sup> See WCB Referral, *supra* note 61.

<sup>91</sup> 47 CFR § 52.15(g)(3)(ii)(C).

<sup>92</sup> *Id.* § 52.15(g)(3)(ii)(D).

<sup>93</sup> Show Cause Order at \*5, para. 15.

<sup>94</sup> *Id.*

<sup>95</sup> Mexico IP Supplemental Response, *supra* note 78.

<sup>96</sup> *Id.*

provided to any governmental agency or industry administrator.”<sup>97</sup> When asked for documentation to support its claims regarding the hiring of “Lee,”<sup>98</sup> Mexico IP responded that “[t]he Company no longer has access to the Fiverr message history.”<sup>99</sup> The Company also did not have “any additional verified contact information, such as a current email address, telephone number, website, or LinkedIn profile.”<sup>100</sup> Mexico IP did not provide any documentation to show proof of payment or cryptocurrency wallet information. Further undermining these claims, Fiverr does not accept cryptocurrency as a payment method.<sup>101</sup>

23. While no evidence points to “Lee,” ample evidence shows that Bharti himself likely orchestrated the numbering scheme. This evidence includes: the three emails from Bharti personally to NANPA’s Support email, including the email enclosing the falsified Public Notice,<sup>102</sup> and the numbering Application, which Bharti signed under oath and appears as the sole author.<sup>103</sup> Without any documentation showing Lance Lee’s existence or his employment with Mexico IP, the most reasonable explanation is that Mexico IP and Bharti engaged in the numbering scheme to facilitate the transmission of illegal robocalls.<sup>104</sup> Mexico IP’s submission of the forged Purported Notice, its failure to list the Task Force Letter on its certification, and its attempt to blame “Lee” does not provide an adequate response to the Show Cause Order or adequate explanation of why the certification is not willfully deficient.

24. Lastly, the Bureau requested that Bharti appear in person at the FCC’s headquarters to substantiate the Company’s responses.<sup>105</sup> Bharti declined stating that “[a]s a small company, international travel may require advance scheduling and could present logistical and financial challenges.”<sup>106</sup> Mexico IP’s RMD certification shows that the contact address for Bharti and the Company’s primary business address as located in Albuquerque, New Mexico.<sup>107</sup> The inability for Mexico IP to send any representative of the Company to Washington, DC due to required international travel indicates that Mexico IP does not have any physical presence in the United States. Mexico IP’s response only demonstrates likely additional deficiencies and inaccuracies in its RMD certification: providing an

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<sup>97</sup> *Id.*

<sup>98</sup> EB Supplemental Request, *supra* note 77.

<sup>99</sup> Mexico IP Supplemental Response, *supra* note 78.

<sup>100</sup> *Id.*

<sup>101</sup> *Payment Methods*, Fiverr, <https://help.fiverr.com/hc/en-us/articles/37332701180945-Payment-methods> (last visited Sept. 1, 2026) (“We don’t accept cryptocurrency.”).

<sup>102</sup> Email from Hemant Bharti (using [admin@mexicoipphone.com](mailto:admin@mexicoipphone.com)), CEO, Mexico IP Phone, to [Support@nanpa.com](mailto:Support@nanpa.com) (Feb. 4, 2026, 11:27 EST); Email from Hemant Bharti, CEO, Mexico IP Phone, to [Support@nanpa.com](mailto:Support@nanpa.com) (Feb. 4, 2026, 11:50 EST); Email from Hemant Bharti, CEO, Mexico IP Phone, to [Support@nanpa.com](mailto:Support@nanpa.com) (Feb. 6, 2026, 7:21 EST).

<sup>103</sup> Mexico IP Application, *supra* note 45.

<sup>104</sup> WCB Referral at 2 (on file at EB-TCD-26-00040954). Even if “Lance Lee” prepared Mexico IP’s regulatory filings, Mexico IP’s lack of oversight over its contractors does not absolve it of liability. *See City Commc’ns, Inc.*, Removal Order, 39 FCC Rcd 4670, 4673 (EB 2024) (“Licensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.”). Mexico IP Phone’s management failure to directly review regulatory filings before submitting them to a government agency shows “careless disregard of statutory requirements” meeting the definition of willfulness. *See Coosemans Specialties, Inc.*, 482 F.3d at 567 (“[A]n action [under 5 U.S.C. § 558(c)] is willful if a prohibited act is done intentionally, irrespective of evil intent, or done with careless disregard of statutory requirements.”) (quoting *Finer Foods Sales Co. v. Block*, 708 F.2d 774, 778 (D.C. Cir. 1983)).

<sup>105</sup> EB Supplemental Request, *supra* note 77.

<sup>106</sup> Mexico IP Supplemental Response, *supra* note 78.

<sup>107</sup> Current Mexico IP RMD Certification.

address not associated with its robocall mitigation contact and stating that it is not a foreign voice service provider.<sup>108</sup> Thus, Mexico IP's response conflicts with the record evidence, and we find that the Company failed to adequately respond to the Show Cause Order or explain why its certification is not willfully deficient.

25. We remove the Company's certification from the RMD as of the release date of this Order. **All intermediate providers and voice service providers must cease accepting traffic directly from Mexico IP within two business days of the release date of this Order.**<sup>109</sup> Mexico IP shall not refile in the RMD unless and until both WCB and the Bureau consent.

#### IV. ORDERING CLAUSES

26. Accordingly, **IT IS ORDERED** that, pursuant to sections 4(i), 4(j), 227(e), 227b, 251(e), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 227(e), 227b, 251(e), and 403, and sections 0.111, 0.311, 1.1, and 64.6305 of the Commission's rules, 47 CFR §§ 0.111, 0.311, 1.1, and 64.6305, this Order is **ADOPTED**.

27. **IT IS FURTHER ORDERED** that the Mexico IP Phone LLC's certification is **IMMEDIATELY REMOVED** from the Robocall Mitigation Database as of the release date of this Order.

28. **IT IS FURTHER ORDERED** that within two business days of the release of this order all intermediate providers and voice service providers **MUST CEASE ACCEPTING TRAFFIC DIRECTLY FROM MEXICO IP PHONE LLC**.<sup>110</sup>

29. **IT IS FURTHER ORDERED** that pursuant to section 1.102(b) of the Commission's rules, 47 CFR § 1.102(b), this Order SHALL BE EFFECTIVE upon release.

30. **IT IS FURTHER ORDERED** that Mexico IP Phone LLC shall not refile in the Robocall Mitigation Database unless and until both the Wireline Competition Bureau and the Enforcement Bureau consent.

31. **IT IS FURTHER ORDERED** that copies of this Order shall be sent by e-mail and certified mail, return receipt requested, to Hemant Kumar Bharti, Mexico IP Phone, 8206 Louisiana Blvd. NE, Ste. A 4666, Albuquerque, NM 87113 and [admin@mexicoipphone.com](mailto:admin@mexicoipphone.com).

FEDERAL COMMUNICATIONS COMMISSION

Hunter P. Deely  
Chief  
Enforcement Bureau

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<sup>108</sup> *Id.*

<sup>109</sup> See 47 CFR § 64.6305(g); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 58; *Global UC Inc., Removal Order*, 37 FCC Rcd 13376, 13379, para. 8 (EB 2022).

<sup>110</sup> Notwithstanding this requirement, providers may not block emergency calls placed to 911 and must make all reasonable efforts not to block calls from public safety answering points and government emergency numbers. See 47 CFR § 64.6305(g)(5).