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

In the Matter of	)	
	)	
Callsto, LLC[1]	)	EB-TCD-26-00040720
	)	EB Docket No. 22-174
	)	

INITIAL DETERMINATION ORDER AND ORDER TO SHOW CAUSE

Adopted: October 8, 2026 **Released: October 8, 2026**

By the Chief, Enforcement Bureau:

I. INTRODUCTION

1. By this Initial Determination Order (Order), the Enforcement Bureau (Bureau) issues its initial determination that Callsto, LLC (Callsto or Company) is not in compliance with section 64.1200 of the Federal Communications Commission's (Commission or FCC) rules.[2] This Order follows the Bureau's June 11, 2026, Notification of Suspected Illegal Traffic and Additional Notification of Robocall Mitigation Database Certification Deficiency (Notice).[3] Callsto now has 14 days to respond to this Order with a final response to the Bureau's initial finding and to demonstrate compliance with the Commission's rules.[4] If Callsto fails to provide an adequate response within 14 days or continues to originate onto the U.S. network substantially similar illegal traffic, the Bureau will issue a Final Determination Order.[5] Any provider immediately downstream from Callsto will then be required to block and cease accepting all traffic received directly from Callsto beginning 30 calendar days after release of the Final Determination Order.[6]

2. In addition, this Order directs Callsto to show cause as to why its deficient certification should not be removed from the Robocall Mitigation Database (RMD) for: (i) failing to correct the discrepancy between the Company's RMD certification and statement in its robocall mitigation plan regarding the level of STIR/SHAKEN implementation across its network, and failing to update its

[1] The Company is registered as "Callsto, LLC" with the Wyoming Secretary of State, but styles itself as "Callsto" in the RMD. *Compare Business Center*, Wyoming Sec'y of State, https://wyobiz.wyo.gov/Business/FilingDetails.aspx?eFNum=153121025178198028158168232196165056199175099201 (last visited June 9, 2026) (showing registration of "Callsto, LLC" in Wyoming), *with* Callsto (RMD0012703), 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=f10507bf1b486910270542ecac4bcb2f&view=sp (last visited Oct. 8, 2026) (showing filing of "Callsto" in the RMD) (Callsto RMD Certification).

[2] *See* 47 CFR § 64.1200.

[3] *See* Letter from Patrick Webre, Chief, FCC Enforcement Bureau, to Henry Sickler, Vice President, Callsto, LLC., 2026 WL 1907770 (June 11, 2026), https://docs.fcc.gov/public/attachments/DOC-422304A1.pdf (Notice).

[4] *See* 47 CFR § 64.1200(n)(2)(ii).

[5] *See id.* § 64.1200(n)(2)(iii).

[6] *See id.* § 64.1200(n)(3).

certification and mitigation plan accordingly;[7] (ii) failing to update its robocall mitigation plan with a description of the measures the Company has in place to know its upstream providers;[8] (iii) failing to describe in its robocall mitigation plan whether it uses any third-party analytics vendor(s), and if so, the name(s) of such vendor(s);[9] and (iv) failing to disclose that the Company has been the subject of a prior agency action,[10] and to provide the required description of such action.[11] Failure to cure these deficiencies within 14 days will result in removal of the Company's certification from the RMD, in which case all voice service providers and intermediate providers will be required to cease accepting calls directly from Callsto.[12]

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.[13] Voice service providers can—and sometimes do—facilitate, or even protect, bad-actor callers.[14] When bad-actor callers are shielded by other bad-actor voice service providers, it is significantly more difficult to stop the calls.[15] To address the problem, the Commission requires voice service providers to block illegal traffic in some cases.[16] 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.[17] On May 18, 2023, the Commission expanded the

[7] *Compare* Callsto RMD Certification, *supra* note 1 (certifying to "Complete STIR/SHAKEN Implementation"), *with* Callsto RMD Certification, *supra* note 1, Attach. ("Callsto LLC has not yet fully implemented STIR/SHAKEN due to existing non-IP portions of our voice network"); *see generally* 47 CFR § 64.6305(d)(1)(i)-(iii), (e)(1)(i)-(iii), (f)(1)(i)-(iii).

[8] Callsto RMD Certification, *supra* note 1; *see also* 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

[9] Callsto RMD Certification, *supra* note 1; *see also* 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

[10] *See 2,411 Robocall Mitigation Database Filers*, Order, 39 FCC Rcd 13318, 13330, para. 1 & Appx. A (EB 2024) (*Show Cause Order*). On December 10, 2024, the Commission issued a Show Cause Order to 2,411 providers, including Callsto, for failing to cure deficiencies in their RMD certifications. *Id.*

[11] Callsto RMD Certification, *supra* note 1; *see also* 47 CFR § 64.6305(d)(2)(iv), (e)(2)(iv), (f)(2)(iv).

[12] 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, para. 60 (2023) (*Sixth Caller ID Authentication Order)*.

[13] *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.").

[14] *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.

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

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

[17] *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,

(continued….)

mandatory call blocking framework created in the *Gateway Provider Order* to all voice service providers.[18]

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.[19] *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.[20] *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.[21] The provider then has an opportunity to respond.[22] *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.[23] 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.[24]

B. RMD Rules and Removal Procedure

5. The FCC established the RMD in 2021 to promote transparency and effective robocall mitigation.[25] Voice service providers, gateway providers, and non-gateway intermediate providers must file a certification in the RMD.[26] The Commission may remove a provider's filing from the RMD that it

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).

[18] *Seventh Call Blocking Order*, 37 FCC Rcd at 5415-17, paras. 29-36 (requirements codified at 47 CFR § 64.1200(n)(2)-(3)).

[19] 47 CFR § 64.1200(n)(2)-(3).

[20] *Id.* § 64.1200(n)(2)(i)(A).

[21] *Id.* § 64.1200(n)(2)(ii).

[22] *Id.*

[23] *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).

[24] 47 CFR § 64.1200(n)(2)(iii); *see id.* § 64.1200(k)(4).

[25] *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).

[26] 47 CFR § 64.6305(d), (e), (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 II.B and other sections below that address removal from the RMD, 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

(continued….)

finds "deficient in some way."[27] 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.[28] 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.[29] 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.[30]

6. Four requirements related to RMD certification are relevant here. *First*, voice service providers and intermediate providers, including 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.[31] In connection with this requirement, every 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.[32] 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 due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN.[33]

7. *Second*, 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.[34] *Third*, a provider must include in its RMD certification a description of the analytics system(s) it uses to identify and block illegal traffic, including whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s).[35] *Fourth*, a provider must 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

64.6305. *See* 47 CFR § 64.6300(o). As such, the term "voice service provider" in section 64.6305 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).

[27] *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).

[28] *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

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

[30] *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2604, para. 60.

[31] 47 CFR §§ 64.6301(a), 64.6302(a)-(d).

[32] *See id.* § 64.6305(d)(1)(i)-(iii), (e)(1)(i)-(iii), (f)(1)(i)-(iii).

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

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

[35] *Id.* § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

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, 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.[36] Under the Commission's rules, intermediate providers and voice service providers shall accept calls directly from a voice service provider, gateway provider, or non-gateway intermediate provider only if that provider's certification appears in the RMD.[37] 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.[38]

C. Callsto's Origination of Suspected Illegal Robocalls

8. USTelecom's Industry Traceback Group (ITG)[39] traced the sources of 32 robocalls[40] placed to emergency telephone lines[41] and wireless numbers[42] between January 27, 2025, and November 5, 2025, without the prior express consent of the called parties.[43] The calls consisted of three apparently illegal robocall campaigns: one involving robocalls placed to emergency telephone lines, and two involving Medicare-related robocalls placed to wireless numbers.[44]

9. The ITG identified Callsto as the originating provider for ten robocalls that were placed to two public-safety answering points (PSAPs) between April 21, 2025, and September 5, 2025, without prior express consent of the called party (i.e., the relevant PSAP).[45] The 911 operators received

[36] *Id.* § 64.6305(d)(2)(iv), (e)(2)(iv), (f)(2)(iv).

[37] *Id.* § 64.6305(g).

[38] *See id.* 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).

[39] The ITG is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks. *See Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, EB Docket No. 20-22, Report and Order, 38 FCC Rcd 7561, 7561, para. 1 (EB 2023).

[40] *See* Notice, *supra* note 3, Attach. A.

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

[42] *See id.* § 64.1200(a)(1)(iii) ("No person or entity may (1) Except as provided in paragraph (a)(2) of this section, initiate any telephone call (other than a call made for emergency purposes or is made with the prior express consent of the called party) using an automatic telephone dialing system or an artificial or prerecorded voice; . . . (iii) [t]o any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call.").

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

[44] *Id.*

[45] *Id.*; *see* FCC Complaint #7786965 (Apr. 17, 2025) (complaint from the Marion County EMS director in Lebanon, Kentucky stating that "[t]hey are getting over 100 robocalls per day.") (Marion County Complaint) (on file at EB-TCD-26-00040720); E-mail from FCC Operations Center, FCC Public Safety and Homeland Security Bureau, to FCC Enforcement Bureau (May 19, 2025 9:45 AM EDT) (complaint from White County 911 reporting "[e]xcessive amount of unwanted, scam, false, and spoofed phone calls received on our 911 lines, alarm lines, and admin lines.") (White County Complaint) (on file at EB-TCD-26-00040720).

prerecorded calls on their emergency lines that contained non-emergency messages.[46] The calls reached an emergency ambulatory line in Marion County, Kentucky, and an emergency line in White County, Georgia.[47] The Marion County emergency ambulance line received eight calls within a 24-hour span originating from eight different numbers.[48] The customer who placed these calls identified by Callsto is based in Mumbai, India.[49] PSAPs provide critical emergency services and any disruption presents a serious threat to public health and safety.[50]

10. The ITG also identified Callsto as the originating provider for the remaining 22 robocalls, which delivered Medicare-related prerecorded voice messages to consumers' wireless telephone numbers without the prior express consent of the called party.[51] Some of the 22 identified calls contained messages claiming that "the new Trump administration has changed the Medicare policies" for the call recipient's state[52] or that there is an "updated plan for Medicare [that] has just been released" asking call recipients if they "have a minute to check what additional benefits [they] can qualify for."[53] Other robocalls told recipients that "Medicare has released many advanced benefits" such as food stamps and cash back "of up to 270 dollars" if they have Medicare parts A and B.[54] Some calls contained the following message, with minor variations:

> Hello. . . Good Afternoon, my name is Lindsey. To ensure that the American citizens are getting what they deserve in this annual enrollment, Medicare has released many advanced benefits such as flex and food card and now you can also get cash back of up to 270 dollars. So, do you have Medicare parts A and B?[55]

The call campaign entices Medicare recipients to provide personal information so that they can obtain allegedly unclaimed Medicare benefits. Some voice messages tell call recipients that the caller is "with the Medicare department,"[56] or the "Med Health center."[57] The calls sometimes prompt recipients to stay on the line while they get transferred,[58] and once transferred, call recipients are asked for their personal information to verify their eligibility.[59] One consumer reported being transferred to a call center that asked for their name, address, and Medicare number.[60] Medicare benefit calls are a common scam campaign targeting older adults, designed to trick them into disclosing sensitive personal information

[46] ITG Traceback Report, *supra* note 43.

[47] Marion County Complaint, *supra* note 45; White County Complaint, *supra* note 45.

[48] *See* ITG Traceback Report, *supra* note 43; *see also* Notice, *supra* note 3, Attach. A (showing that the terminating number {[ ]} was called from eight different numbers between April 21, 2025, and April 22, 2025).

[49] *See* ITG Traceback Report, *supra* note 43.

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

[51] *See* ITG Traceback Report, *supra* note 43.

[52] *Id*. (traceback no. 28820, recording of robocall received on June 26, 2025).

[53] *Id*. (traceback no. 22538, recording of robocall received on Jan. 27, 2025).

[54] *Id*. (traceback nos. 33987-89, recordings of robocalls received on Nov. 5, 2025).

[55] *Id*. (traceback no. 33989, recording of robocall received on Nov. 5, 2025).

[56] *Id*. (traceback no. 33599, recording of robocall received on Oct. 24, 2025).

[57] *Id*. (traceback no. 31008, recording of robocall received on Aug. 13, 2025).

[58] FCC Complaint #7110279 (June 21, 2024) (on file at EB-TCD-26-00040720).

[59] FTC Complaint #197159212 (Jan. 30, 2026) (on file at EB-TCD-26-00040720).

[60] *Id*.

such as their Medicare number.[61]

D. Callsto's Deficient RMD Certification

11. As described in the Notice, Callsto's RMD certification is deficient in four ways. *First*, its RMD filing contains contradictory information regarding its implementation of the STIR/SHAKEN authentication framework. Callsto certified in the RMD that it is a voice service provider and a gateway provider, that "it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301," and that "all calls it carries or processes" as a gateway provider are compliant with 47 CFR § 64.6302.[62] However, the Company indicates in its robocall mitigation plan, which is submitted as part of its RMD filing, that there are portions of its network that are non-IP, and that it has not implemented STIR/SHAKEN across those non-IP portions.[63] The Company did not identify or claim an applicable extension of the STIR/SHAKEN implementation obligation in its RMD filing for the non-IP portions of its network.[64] *Second*, Callsto's robocall mitigation plan fails to describe any procedures in place to know its upstream providers.[65] *Third*, the Company indicates in its mitigation plan that it uses "industry-standard call analytics and robocall scoring tools to assess traffic risk in real time,"[66] 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.[67] *Fourth,* the Notice explained that "RMD filers are also required to identify all principals, affiliates, subsidiaries, and parent companies of the filing entity,"[68] and that "Callsto appears to be related to Aspireistic Inc. and possibly other entities suspected of routing apparently illegal traffic."[69] The Notice stated that, "if Callsto shares common ownership, management, or control with Aspireistic or any other entity, Callsto must disclose Aspireistic and any other related entity as a principal, affiliate, subsidiary, or parent company, as applicable, in its RMD filing."[70] Yet, Callsto did not reference Asipireistic, or any other entities mentioned in the Notice, in its filing. *Finally*, Callsto failed to disclose in its RMD filing that it had been named in the Bureau's *Show Cause Order*[71] and to provide the required description of that agency action, which included findings of a deficient RMD certification.[72].

E. Callsto's Response to the Notice

12. The Notice provided Callsto 14 days to satisfy the above-described obligations regarding its apparent origination of illegal traffic, and 14 days to cure its deficient RMD certification.[73] Callsto

[61] National Council on Aging, *5 Warning Signs of a Medicare Scam and How to Protect Yourself* (Feb. 24, 2025), https://www.ncoa.org/article/5-warning-signs-of-a-medicare-scam-and-how-to-protect-yourself/; Federal Commc'ns Comm'n, *Older Americans and Medicare Call Scams*, https://www.fcc.gov/older-americans-and-medicare-scams (last visited Apr. 7, 2026).

[62] Callsto RMD Certification, *supra* note 1.

[63] *Id.*, Attach. at 1 (stating, in the Company's mitigation plan, that "Callsto LLC has not yet fully implemented STIR/SHAKEN due to existing non-IP portions of our voice network").

[64] *See* Callsto RMD Certification, *supra* note 1.

[65] *See id.*, Attach. at 1-2.

[66] *See id.*, Attach. at 2.

[67] *See* Callsto RMD Certification, *supra* note 1.

[68] Notice at 10, note 87 (citing *Sixth Caller ID Authentication Report and Order*, 38 FCC Rcd at 2597, para. 46).

[69] Notice at 10, note 87.

[70] *Id.*

[71] *See Show Cause Order*, 39 FCC Rcd at 13318, 13330, para. 1 & Appx. A.

[72] *See* Callsto RMD Certification, *supra* note 1.

[73] *See* Notice, *supra* note 3, at 8-10.

responded on June 15, 2026.[74]

13. Callsto's response asserts that "[u]pon receipt of the Notice, [Callsto] promptly initiated a comprehensive internal investigation into the traffic identified."[75] Central to Callsto's response is its unqualified determination that, contrary to the evidence cited by the Notice,[76] the Company "[had] **not act[ed] as the originating or gateway provider** for the identified traffic. Instead, [the Company] functioned as an **intermediate provider** transmitting traffic received from an upstream provider."[77] Callsto asserts that its determination "is supported by call routing records and network data confirming that the traffic entered [its] network from upstream sources before being transmitted downstream."[78] Callsto did not identify any upstream sources, however. Although Callsto denies originating the calls identified in the Notice, Callsto asserts that it took "immediate and decisive action to mitigate the identified traffic," and specifically that it has "[b]locked all traffic associated with the identified calling patterns and sources," "[s]uspended or terminated the responsible customer account(s), where applicable," [p]revented further transmission of the identified traffic through our network," and [i]nitiated enhanced monitoring for similar traffic patterns."[79] In addition, Callsto states that it has also "taken steps to engage with the downstream provider(s) to notify them of the identified traffic and encourage appropriate remediation measures."[80] Callsto also purports that it has "identified and taken action regarding downstream providers associated with higher traceback volumes."[81] Finally, Callsto's response states that the Company "is committed to full compliance with 47 U.S.C. § 227, 47 CFR § 64.1200, and its Robocall Mitigation Database certification," "remains committed to cooperating with the FCC, the [ITG], and other stakeholders to identify and prevent illegal robocalls," and is "prepared to provide additional information or supporting documentation upon request."[82] Callsto has made no revisions to its deficient RMD certification in response to the Notice.[83]

III. DISCUSSION

A. Callsto May Be Subject to Mandatory Call Blocking

14. Callsto is in apparent violation of section 64.1200(n)(2) of the Commission's rules because it has not provided a complete or probative response to the Notice. Callsto denies originating the 32 illegal[84] robocalls identified in the Notice, asserting instead it transmitted the calls as a non-gateway

[74] *See* Letter from Zeeshan Ahmed, President, Callsto, to FCC Enforcement Bureau (June 15, 2026) (on file at EB-TCD-26-00040720) (Callsto Response)

[75] *Id.* at 1.

[76] *See supra* paras. 9-11 (citing ITG Traceback Report, *supra* note 43).

[77] Callsto Response, *supra* note 74, at 1 (emphasis in original). As a gateway provider is a type of intermediate provider, we understand Callsto's statement to mean that it claims to have transmitted the identified calls as a non-gateway intermediate provider. *See generally* 47 CFR § 64.6300(d), (g), (i) (defining "gateway provider," "intermediate provider," and "non-gateway intermediate provider," respectively).

[78] Callsto Response, *supra* note 74, at 1. Callsto provided neither the call routing records nor the network data to the Bureau.

[79] *Id.*

[80] *Id*. at 2.

[81] *Id.*

[82] *Id*. at 1, 3.

[83] *Compare* Callsto RMD Certification, *supra* note 1, *with supra* para. 12 (describing the deficiencies in the Company's RMD certification as identified in the Notice).

[84] The identified calls are deemed illegal under the Commission's rules as Callsto has not made any showing, based on its investigation, that the calls were not illegal. *See* 47 CFR § 64.1200(n)(2)(i)(B). If Callsto had concluded that the calls were not illegal, it would have been required to provide an explanation for reaching that conclusion. *See* (continued….)

intermediate provider on behalf of "an upstream provider."[85] Callsto states that it relied on "call routing records and network data confirming the traffic" originated elsewhere,[86] but it has not provided the call routing records, network data, or any other evidence to support its assertion that it did not originate the illegal calls identified in the Notice. By contrast, the record contains ample evidence demonstrating that Callsto in fact did originate the identified calls. The ITG determined—based on information submitted by Callsto in its responses to traceback requests—that Callsto was the originating provider for each of the calls.[87] For each call, Callsto's traceback response identified an end-user customer as the source of the call—not an upstream provider— thereby acknowledging its role as the originating provider.[88] Specifically, Callsto identified seven end user customers located in India as the sources of the calls and, for each of these customers, asserted that it had "[t]erminated calling party service."[89] We also note that Callsto's assertion that it acted as a non-gateway intermediate provider for each of the identified calls is inconsistent with its certification in the RMD: In its RMD certification, Callsto certified that it is both a voice service provider that originates calls and a gateway provider that introduces calls onto the U.S. telecommunications network from foreign voice service providers.[90] Callsto did not, however, certify that it is a non-gateway intermediate provider, even though that option was available to it and mandatory if applicable.[91] Accordingly, at this stage, the Bureau is unpersuaded by Callsto's unsupported assertion that it did not originate the illegal calls.

15. Even if Callsto's claim that it acted as a non-gateway intermediate provider for the identified calls were true, the Company nonetheless has failed to comply with the instructions in the Notice and the requirements in section 64.1200(n)(2)(i)(B).[92] If Callsto acted as a non-gateway intermediate provider for any of the identified calls, the Notice and section 64.1200(n)(2)(i)(B) required it to do two things: (i) "provide an explanation as to how the Company reached [its] conclusion" that it did not serve as the gateway provider or originating provider for the call, and (ii) "identify the upstream provider(s) from which the Company received the identified traffic."[93] Callsto's sole basis for concluding that it was not the gateway provider was that "call routing records and network data confirm[ed] that the traffic entered Callsto's network from upstream sources."[94] However, Callsto failed to explain how the "call routing records and network data" show that Callsto did not originate the traffic. Moreover, Callsto did not identify the upstream provider for each of the identified calls, as the Notice required.

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id.; Notice, *supra* note 3, at 9. It did not do so. Further, the mitigation actions described in Callsto's response, *see supra* para. 14, are consistent with a conclusion that the calls were illegal.

[85] Callsto Response, *supra* note 74, at 1.

[86] *Id*.

[87] Notice, *supra* note 3, at 5. The ITG traces a call to its source by working upstream: starting from the terminating provider whose customer received the call, it asks each provider to identify the provider immediately upstream that handed it the call. *Policies and Procedures*, Indus. Traceback Grp., 6 (Aug. 2025), https://tracebacks.org/wp-content/uploads/2025/09/ITG_Policies-Procedures_Aug_2025.pdf.

[88] Notice, *supra* note 3, at 5; ITG Traceback Report, *supra* note 43.

[89] Notice, *supra* note 3, at 5 & n.43 (identifying the seven customers as AB Infotech Ltd, Trutel Infotech, HighSky Infotech, Harliv Global Solutions Pvt Ltd, Edgewise Insight Pvt Ltd, Rudrax Telecommunications, and RP Lead Solutions, all of which are based in India); ITG Traceback Report, *supra* note 43.

[90] Callsto RMD Certification, *supra* note 1.

[91] *See* 47 CFR § 64.6305(f). We note that, if Callsto did transmit the identified calls as a non-gateway intermediate provider as it claims, that would establish another deficiency in its RMD certification. But for reasons explained in the text, its claim is unsupported and contrary to the information that it provided to the ITG.

[92] Notice, *supra* note 3, at 9 (citing 47 CFR § 64.1200(n)(2)(i)(B)).

[93] *Id.*

[94] Callsto Response, *supra* note 74, at 1.

16. Given the insufficiency of Callsto's response, the Bureau now issues this Order and directs the Company to file a final response before the Bureau makes a final determination as to the Company's compliance with section 64.1200. The response must include the specific information enumerated on page nine of the Notice, including (if it continues to assert that it did not originate or serve as the gateway provider for the identified calls) an explanation as to how the Company reached that conclusion, with supporting evidence, and information identifying the upstream provider for each of the calls.[95] Consistent with Callsto's commitment in its June 15, 2026, response to provide additional information or supporting documentation upon request, the Company's final response should include the call routing records and network data supporting its assertion that it did not originate the identified calls and evidence that it terminated the upstream providers or end-user customers responsible for the calls, including their names, contact information, and Internet Protocol addresses, and the date of each termination. In addition, Callsto did not address its relationship with Aspireistic -- or any of the other entities mentioned in the Notice – in its Response. It should do so in response to this Initial Determination Order, including whether the companies share common management and how each relationship was formed, and should enclose copies of any agreements memorializing those relationships.

17. Failure to respond to this Order or submit the information enumerated on page nine of the Notice will result in the Bureau issuing a Final Determination Order.[96] The Final Determination Order will be published in EB Docket No. 22-174 and serve as notification to all immediate downstream providers that they must block and cease accepting all traffic received directly from Callsto beginning 30 days after release of the Final Determination Order.[97]

B. Callsto's RMD Certification Remains Deficient

18. We find Callsto's RMD certification remains deficient as detailed in the Notice on June 11, 2026,[98] given the Company has not updated its certification since February 20, 2026.[99] Specifically, Callsto's RMD certification still has the following deficiencies: (i) 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;[100] (ii) the Company fails to describe in its robocall mitigation plan how it complies with its obligation to know its upstream providers;[101] (iii) 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;[102] and (iv) the Company fails to disclose that it has been the subject of a prior agency action[103] and to provide the required description of such action.[104] The Notice directed Callsto to either cure these deficiencies in its RMD.[105] The Company did not.

19. Accordingly, the Bureau directs Callsto to cure these deficiencies or explain why the Bureau should not remove the Company's certification from the RMD. This Order affords Callsto a final

[95] *Id.* at 9; *see also* 47 CFR § 64.1200(n)(2)(ii).

[96] 47 CFR § 64.1200(n)(2)(iii).

[97] *Id.* § 64.1200(n)(3).

[98] *See* Notice, *supra* note 3, at 6-7.

[99] *See* Callsto RMD Certification, *supra* note 1.

[100] *Compare* Callsto RMD Certification, *supra* note 1 (indicating "Complete STIR/SHAKEN Implementation"), *with* Callsto RMD Certification, *supra* note 1, Attach. ("Callsto LLC has not yet fully implemented STIR/SHAKEN"); *see generally* 47 CFR § 64.6305(d)(1)(i)-(iii), (e)(1)(i)-(iii), (f)(1)(i)-(iii).

[101] Callsto RMD Certification, *supra* note 1; *see also* 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

[102] Callsto RMD Certification, *supra* note 1; *see also* 47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), (f)(2)(ii).

[103] *See Show Cause Order*, 39 FCC Rcd at 13330.

[104] Callsto RMD Certification, *supra* note 1; *see also* 47 CFR § 64.6305(d)(2)(iv), (e)(2)(iv), (f)(2)(iv).

[105] *See* Notice, *supra* note 3, at 10.

opportunity to cure its deficiencies by responding fully to the Notice in accordance with the Commission's rules.[106] Alternatively, the Company may explain why its certification is not deficient.

20. Callsto shall file its response with the Bureau within 14 calendar days of the date of this Order.[107] Failure to respond and correct the deficiency, or to provide a sufficient explanation for why Callsto should retain its certification in the RMD, will result in removal of the certification and accompanying filing.[108] Removal of Callsto's certification from the RMD will require all voice service providers, gateway providers, and intermediate providers to cease accepting calls directly from Callsto.[109] If Callsto's certification 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

21. 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, Callsto, LLC **SHALL FILE** any written final response to this Initial Determination Order and Show Cause Order **within 14 calendar days** from the release date of this Initial Determination Order and Show Cause Order.

22. 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.

23. **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.

24. **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 Henry A. Sickler, Vice President, Callsto, LLC, 1621 Central Avenue, #9747, Cheyenne, WY 82001, and by e-mail to support@callsto.net.

FEDERAL COMMUNICATIONS COMMISSION

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Hunter P. Deeley
Chief
Enforcement Bureau

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

[107] *Id*.

[108] *Id.*

[109] 47 CFR § 64.6305(g).