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

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| In the Matter of<br><br>Advantage Investors llc<br>sunstreamnetwork<br>Quantum Link VOIP<br>Summit Industries<br>Scissortail Communications, LLC<br>Globe Tech Solutions<br>Alpha Stream<br>MMN Tech LLC | EB-TCD-26-00041364[1] |

**ORDER**

**Adopted: November 13, 2026** **Released: November 13, 2026**

By the Chief, Enforcement Bureau:

## I. INTRODUCTION

1. By this Order, the Enforcement Bureau (Bureau) of the Federal Communications Commission (Commission or FCC) removes the certifications of the eight companies (each, a Company; collectively, the Companies) identified in Appendix A from the Robocall Mitigation Database (RMD). On August 27, 2026, the Bureau issued an *Order* directing each Company to address deficiencies in its RMD certification and to notify the Bureau upon doing so or, alternatively, to file a response explaining why the Bureau should not remove the Company's certification from the RMD (*August 2026 Show Cause Order*).[2] The eight Companies each failed to do either. Their RMD filings are deficient because each of the Companies failed to respond to multiple traceback requests from the industry traceback consortium, which is contrary to their certifications in the RMD.[3] **Removal of a Company's certification from the RMD requires all intermediate providers and voice service providers to cease accepting all calls directly from the Company except those to 911 or from public safety answering points and government emergency numbers.**[4] The Companies shall not re-file an RMD certification without the prior approval of the Bureau and the Commission's Wireline Competition Bureau (WCB).

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[1] The investigation began under EB-TCD-25-00038569 and was subsequently assigned File No. EB-TCD-26-00041364. Any future correspondence with the Commission concerning this matter should reflect the new case number.

[2] *Advantage Investors llc; sunstreamnetwork; Quantum Link VOIP; Summit Industries; Scissortail Communications, LLC; Globe Tech Solutions; COLLECTION 3 LLC; Alpha Stream; MMN Tech LLC*, Order, DA 26-873, 2026 WL 2554265, at *1, para. 1 (EB Aug. 27, 2026), https://docs.fcc.gov/public/attachments/DA-26-873A1.pdf (*August 2026 Show Cause Order*).

[3] *See* 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(iii) (requiring voice service providers, gateway providers, and non-gateway providers to certify that they commit to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium); *see also Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 2573, 2590, para. 31 (2023) (*Sixth Caller ID Authentication Order*).

[4] 47 CFR § 64.6305(g). "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).

## II. BACKGROUND

2. The Commission adopted rules to establish the RMD in 2020 to promote transparency and effective robocall mitigation.[5] In addition to establishing the RMD and requiring voice service providers to file certifications in the RMD once it opened, the *Second Caller ID Authentication Order* required any voice service provider that has not fully implemented the STIR/SHAKEN caller ID authentication framework on their entire IP network to implement an appropriate robocall mitigation program.[6] The Order required that any such mitigation program include reasonable steps to avoid originating illegal robocall traffic and a commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.[7] In addition, the Commission required voice service providers, not later than June 30, 2021, to certify in the RMD that their traffic was signed with STIR/SHAKEN or subject to a robocall mitigation program.[8] Specifically, voice service providers were required to certify that they had: (i) fully implemented STIR/SHAKEN across their entire network, (ii) partially implemented STIR/SHAKEN on their network and originating calls not signed with STIR/SHAKEN were subject to a robocall mitigation program, or (iii) not implemented STIR/SHAKEN on any portion of their network and all of their originating calls were subject to a robocall mitigation program.[9] Voice service providers certifying to partial or no STIR/SHAKEN implementation were thus required to certify their "commitment to respond fully and in a timely manner to all traceback requests."[10]

3. On March 16, 2023, the Commission adopted amendments to section 64.6305 of its rules in the *Sixth Caller ID Authentication Order* that enhanced the information requirements for RMD certifications, including by expanding the obligation to implement an appropriate robocall mitigation program (and to submit a robocall mitigation plan describing that program as part of its RMD certification) to all new and existing filers.[11] On May 18, 2023, the Commission adopted additional amendments to section 64.6305 in the *Seventh Call Blocking Order* that required all providers to include a commitment to respond fully to traceback requests within 24 hours in their RMD certification.[12] Both of

[5] *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1902, para. 82 (2020) (*Second Caller ID Authentication Order*). The RMD opened for filings on April 20, 2021. *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).

[6] *Second Caller ID Authentication Order*, 36 FCC Rcd at 1899-1901, paras. 76-79; 47 CFR § 64.6305(a) (2021).

[7] *Second Caller ID Authentication Order*, 36 FCC Rcd. at 1899, 1900-01, paras. 76, 79.

[8] *Id*. at 1902, para. 82; 47 CFR § 64.6305(c)(1)-(2) (2021).

[9] 47 CFR § 64.6305(c) (2021).

[10] *Id*. § 64.6305(c)(2)(iii) (2021). Two of the Companies—Advantage Investors and sunstreamnetwork—certified to partial STIR/SHAKEN implementation (Advantage) or no STIR/SHAKEN implementation (sunstreamnetwork) in 2023 and, therefore, were required to include a statement of their commitment to respond to traceback requests in their RMD certifications. *See id.*; Advantage Investors llc Listing (No. RMD0013473), Fed. Commc'ns Comm'n, Robocall Mitigation Database (Feb. 20, 2025) (first filed Apr. 4, 2023; revised July 20, 2023), Robocall Mitigation Database Form – Robocall Mitigation Database (Advantage Investors RMD Certification) (on file in EB-TCD-26-00041364); sunstreamnetwork Listing (No. RMD0012936), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Jan. 17, 2023), Robocall Mitigation Database Form – Robocall Mitigation Database (sunstreamnetwork RMD Certification) (certifying to no STIR/SHAKEN implementation and that all of its calls are subject to a robocall mitigation program). Although Advantage later updated its certification to reflect complete STIR/SHAKEN implementation, its July 2023 certification to partial STIR/SHAKEN implementation was operative when it received the traceback requests listed in Appendix B of the *August 2026 Show Cause Order*.

[11] *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2588-2601, paras. 28-52.

[12] *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, 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

these rule amendments took effect on February 26, 2024, and required all existing filers to update their RMD certifications to provide the newly-required information and updated robocall mitigation plans by that same date.[13]

4. Under the amended rule, voice service providers, gateway providers, and non-gateway intermediate providers must submit several pieces of information in their RMD filings and certify to their compliance with certain requirements under penalty of perjury.[14] As relevant here, section 64.6305 requires voice service providers, gateway providers, and non-gateway intermediate providers to certify, under penalty of perjury, that all calls that they originate, carry, or process are subject to a robocall mitigation program, and such programs must include "a commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium."[15] Accordingly, under the rules in effect since February 26, 2024, every provider that files a certification in the RMD expressly certifies that "all of the calls . . . on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305[], which shall include a commitment to respond fully and within 24 hours to all traceback requests."[16] Section 64.6305 also requires voice service providers, gateway providers, and non-gateway intermediate providers to include a statement of this commitment in their certification.[17]

Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404, 5422, para. 52 (2023) (*Seventh Call Blocking Order*).

[13] *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, 383-384 (WCB 2024) (*RMD Public Notice*); *Federal Register Effective Date Notice*, 89 Fed. Reg. at 4833.

[14] The *Sixth Caller ID Authentication Order* amended section 64.6305 to require non-gateway intermediate providers to file certifications in the RMD for the first time. 47 CFR § 64.6305(f); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2593, para. 38; *RMD Public Notice*, 39 FCC Rcd at 384.

[15] 47 CFR § 64.6305(a)(2), (d)(1) (voice service providers), (b)(2), (e)(1) (gateway providers), (c)(2), (f)(1) (non-gateway intermediate providers); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2592-93 paras. 37-38; *RMD Public Notice*, 39 FCC Rcd at 384-85. The Industry Traceback Group (ITG) established by USTelecom – The Broadband Association currently serves as the registered industry traceback consortium. *See Implementing Section 13(d) of the Pallone-Thune Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act)*, EB Docket No. 20-22, Report and Order, 38 FCC Rcd 7561, 7561-62, para. 1 (EB 2023).

[16] FCC, Robocall Mitigation Database External Filing Instructions at 15-20, ( July 2026) https://www.fcc.gov/sites/default/files/rmd-instructions.pdf (listing certification language for voice service providers, gateway providers, and non-gateway intermediate providers, respectively).

[17] 47 CFR § 64.6305(d)(2)(iii), (e)(2)(iii), (f)(2)(iii).

5. Each of the Companies certified to its commitment to respond to all traceback requests in the RMD.[18] However, each of the Companies has not responded to multiple traceback requests since it made its certification, as shown in Appendix B of the *August 2026 Show Cause Order*.[19]

6. The Bureau may remove a certification from the RMD that it finds "deficient in some way."[20] To do so, the Bureau first contacts the provider, notifying it that its certification is deficient, explaining the nature of the deficiency, and giving the provider an opportunity to cure the deficiency.[21] If the provider fails to cure the deficiency, the Bureau will release an order finding that a provider's certification is deficient based on the available evidence and direct the provider to, within 14 days, cure the deficiency in its certification and notify the Bureau that the deficiency has been cured, or explain why the Bureau should not remove the Company's certification from the RMD.[22] If the provider fails to cure the deficiency or provide a sufficient explanation why its certification is not deficient within that 14-day period, the Bureau will release an order removing the provider's certification from the RMD.[23]

7. On September 29, 2025, the Bureau issued a Notification of Deficient Robocall Mitigation Database Certification (Notification) to each of the Companies.[24] The Notifications informed

[18] As applicable to the tracebacks identified in Attachment B of the *August 2026 Show Cause Order*, Advantage Investors llc and sunstreamnetwork filed their operative RMD certifications in 2023. *See* Advantage Investors RMD Certification (revised July 20, 2023) (certifying to partial STIR/SHAKEN implementation and performing robocall mitigation) (on file in EB-TCD-26-00041364); sunstreamnetwork RMD Certification (filed Jan. 17, 2023) (certifying to no STIR/SHAKEN implementation and performing robocall mitigation ). The remainder of the Companies filed their operative RMD certifications after the amendments to section 64.6305 took effect in February 2024. *See* Quantum Link VOIP Listing (No. RMD0020178), Fed. Commc'ns Comm'n, Robocall Mitigation Database (revised Apr. 3, 2024), Robocall Mitigation Database Form – Robocall Mitigation Database (Quantum Link VOIP RMD Certification); Summit Industries Listing (No. RMD0020527), Fed. Commc'ns Comm'n, Robocall Mitigation Database (Apr. 11, 2024), Robocall Mitigation Database Form – Robocall Mitigation Database (Summit Industries RMD Certification); Scissortail Communications, LLC Listing (No. RMD0002438), Fed. Commc'ns Comm'n, Robocall Mitigation Database (revised Apr. 19, 2024), Robocall Mitigation Database Form – Robocall Mitigation Database (Scissortail Communications, LLC RMD Certification); Globe Tech Solutions Listing (No. RMD0020528), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Apr. 11, 2024), Robocall Mitigation Database Form – Robocall Mitigation Database (Globe Tech Solutions RMD Certification); Alpha Stream Listing (No. RMD0020529), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Apr. 11, 2024), Robocall Mitigation Database Form – Robocall Mitigation Database (Alpha Stream RMD Certification); MMN Tech LLC Listing (No. RMD0024414), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Nov. 28, 2024), Robocall Mitigation Database Form – Robocall Mitigation Database (MMN Tech LLC RMD Certification) (collectively, RMD Certifications).

[19] ITG Traceback Report (July 1, 2025); ITG Traceback Report (July 29, 2025); *August 2026 Show Cause Order*, Appx. B (listing, for each Company, the traceback requests to which it failed to respond).

[20] 47 CFR § 0.111(a)(28)(i); *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83 (voice service provider certifications); *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Sixth Report and Order in CG Docket No. 17-59, Fifth Report and Order in WC Docket No. 17-97, Order on Reconsideration in WC Docket No. 17-97, Order, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, and Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, 37 FCC Rcd 6865, 6882, para. 40 (2022) (*Gateway Provider Order*) (gateway provider certifications); *Sixth Caller ID Authentication Order*, 38 FCC Rcd at 2603, para. 57 (non-gateway intermediate provider certifications).

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

[22] *Id.*

[23] *Id.*

[24] Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to Advantage Investors llc RMD Contact (Sept. 29, 2025 11:22 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-TCD-26-00041364); Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to sunstreamnetwork RMD Contact (Sept. 29, 2025 11:26 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-

the Companies that their certifications were deficient because each Company "has not responded to at least one traceback request from the ITG" and instructed them to "cure the deficiency by responding fully to each traceback request issued by the ITG."[25]

8. On August 27, 2026, the Bureau released the *August 2026 Show Cause Order*, which required the Companies to cure their deficient RMD certifications and notify the Bureau that the deficiencies have been cured or explain why the Bureau should not remove the Company's certification from the RMD.[26] Specifically, the *August 2026 Show Cause Order* informed each Company that to cure its certification deficiency it needed to "respond[] fully to each traceback requests identified in Appendix B that was issued by the ITG to the Company (as well as all future traceback requests)."[27] The *August 2026 Show Cause Order* instructed each Company to file its response with the Bureau within 14 days.[28] None of the Companies responded to the traceback requests identified in Appendix B of the *August 2026 Show Cause Order* or provided an explanation why its certification is not deficient.

## III. DISCUSSION

9. The Bureau finds that the Companies listed in Appendix A have deficient RMD certifications. Each of the Companies certified to its commitment to respond to all traceback requests.[29] Despite this, each of the Companies failed to respond to multiple traceback requests.[30] The *August 2026 Show Cause Order* afforded each Company a final opportunity to cure its RMD certification deficiency or explain why its certification is not deficient.[31] Each Company listed in Appendix A failed to take remedial measures by responding to the traceback requests identified in the *August 2026 Show Cause Order*. Nor did any of the Companies explain why its filing renders its certification is not deficient. Therefore, each Company's RMD certification remains deficient.

10. We remove the certifications of the Companies identified in Appendix A from the RMD as of the release date of this Order. **All intermediate providers and voice service providers must cease accepting traffic directly from the Companies, except calls to 911 or from public safety answering**

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TCD-26-00041364); Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to Quantum Link VOIP RMD Contact (Sept. 29, 2025 11:24 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-TCD-26-00041364); Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to Summit Industries RMD Contact (Sept. 29, 2025 11:25 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-TCD-26-00041364); Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to Scissortail Communications, LLC RMD Contact (Sept. 29, 2025 11:29 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-TCD-26-00041364); Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to Globe Tech Solutions RMD Contact (Sept. 29, 2025 11:29 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-TCD-26-00041364); Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to Alpha Stream RMD Contact (Sept. 29, 2025 11:22 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-TCD-26-00041364); Email from Enforcement Bureau TCD address (EnforcementBureauTCD@fcc.gov) to MMN Tech LLC RMD Contact (Sept. 29, 2025 11:24 AM EDT) (including, as an attachment, a Notification of Deficient Robocall Mitigation Database Certification) (on file in EB-TCD-26-00041364) (collectively, Notifications).

[25] Notifications.

[26] *August 2026 Show Cause Order* at *3, para. 10.

[27] *Id*.

[28] *Id.* at *3, para. 11.

[29] RMD Certifications.

[30] ITG Traceback Report (July 1, 2025); ITG Traceback Report (July 29, 2025); *August 2026 Show Cause Order*, Appx. B (listing, for each Company, the traceback requests to which it failed to respond).

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

**points and government emergency numbers, within two business days of the release date of this Order.**[32] The Companies shall not refile in the RMD unless and until both WCB and the Bureau consent.

## IV. ORDERING CLAUSES

11. 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**.

12. **IT IS FURTHER ORDERED** that the Companies listed in Appendix A are **IMMEDIATELY REMOVED** from the Robocall Mitigation Database as of the release date of this Order.

13. **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, EXCEPT CALLS TO 911 OR FROM PUBLIC SAFETY ANSWERING POINTS AND GOVERNMENT EMERGENCY NUMBERS, DIRECTLY FROM THE COMPANIES LISTED IN APPENDIX A**.

14. **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.

15. **IT IS FURTHER ORDERED** that each Company listed in Appendix A shall not refile in the Robocall Mitigation Database unless and until both the Wireline Competition Bureau and the Enforcement Bureau consent.

16. **IT IS FURTHER ORDERED** that copies of this Order shall be sent by email and certified mail to the robocall mitigation contact (as certified in the RMD) for each Company listed in Appendix A.

FEDERAL COMMUNICATIONS COMMISSION

Hunter P. Deeley
Chief
Enforcement Bureau

[32] *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).

## APPENDIX A

| RMD File No. | Business Name |
|---|---|
| RMD0013473 | Advantage Investors llc |
| RMD0012936 | sunstreamnetwork |
| RMD0020178 | Quantum Link VOIP |
| RMD0020527 | Summit Industries |
| RMD0002438 | Scissortail Communications, LLC |
| RMD0020528 | Globe Tech Solutions |
| RMD0020529 | Alpha Stream |
| RMD0024414 | MMN Tech LLC |