



United States of America  
FEDERAL TRADE COMMISSION  
East Central Region

1111 Superior Avenue, Suite 200  
Cleveland, Ohio 44114  
(216) 263-3455

Jon Miller Steiger  
Director

November 27, 2023

**CEASE AND DESIST DEMAND**

*VIA EMAIL TO:*  
*sop@cscinfo.com*

Tata Communications (America) Inc.  
Troy Reynolds, CEO  
11911 Freedom Drive, Suite 250  
Reston, VA 20190  
c/o Corporation Service Company, Registered Agent

We have determined that Tata Communications (America) Inc. is apparently routing and transmitting illegal robocall traffic, directly or indirectly, for entities involved in the following campaigns:

- Amazon-AuthorizeOrder
- Amazon-AuthorizeOrder-P2
- Amazon-AuthorizeOrder-P3
- Amazon-SuspiciousCharge-P1
- Amazon-Various-P3
- Apple-iCloud-AccountBreached
- Authorized-Order-P2
- Bank-Impers-P2
- CBP-GovtImpers-P2
- Chinese-Exit-Entry
- Chinese-PackageDelivery-P3
- Chinese-PackageDelivery-P4
- Discount-Avail50%
- Financial-Impers-2
- Financial-Impers-4
- Financial-Impers-7
- GovtImpers
- LegalDept-Action-P1
- SSA-Impers
- SSA-P1-BenefitsCanceled (GovtImpers)

- TestCall-StaySafeStayHome
- Utility-30MinDisconnect
- Utility-Impers-P2
- Verizon-Phishing

More specifically, our investigation revealed that Tata Communications (America) Inc. apparently routed and transmitted illegal robocalls as set forth in Attachment A.

The Federal Trade Commission (FTC) works closely with USTelecom’s Industry Traceback Group (ITG), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.<sup>1</sup> Between January 13, 2021 and October 11, 2023, ITG investigated 56 prerecorded voice message calls that law enforcement, voice service providers using honeypots (i.e., unassigned numbers held by providers to detect illegal robocalls), and customers of YouMail had flagged as illegal robocalls made without consent of the called party.<sup>2</sup> ITG conducted tracebacks and determined that Tata Communications (America) Inc. routed and transmitted the calls. ITG previously notified you of these calls and provided you access to supporting data identifying each call—including a recording and/or a description of the illegal robocall—as indicated in Attachment A. Further, the numerous traceback notices directed to Tata Communications (America) Inc. indicate that you are apparently routing and transmitting illegal robocall traffic knowingly. **IF YOU ARE ENGAGED IN THESE ACTIVITIES, THEN YOU MUST IMMEDIATELY CEASE AND DESIST FROM ENGAGING IN THEM.**

The FTC, the nation’s consumer protection agency, enforces the Federal Trade Commission Act (FTC Act), 15 U.S.C. § 45 et seq., which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces the Telemarketing Sales Rule (TSR), 16 C.F.R. Part 310, which prohibits deceptive and abusive telemarketing practices. Section 310.3(b) of the TSR prohibits “assisting and facilitating” certain specified conduct.<sup>3</sup> Under that provision, it is unlawful for any person or entity to “provide substantial assistance or support to any seller or telemarketer when that person knows or consciously avoids knowing that the seller or telemarketer is engaged in any act or practice that violates Sections 310.3(a), (c), or (d), or Section 310.4 of this Rule.” These Sections prohibit, among others, the following conduct:

- Making a false or misleading statement to induce any person to pay for goods or services or to induce a charitable contribution (16 C.F.R. § 310.3(a)(4));
- Misrepresenting a seller or telemarketer’s affiliation with any government entity (16 C.F.R. § 310.3(a)(2)(vii));
- Transmitting false or deceptive caller ID numbers (16 C.F.R. § 310.4(a)(8));

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<sup>1</sup> See Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274, Sec. 13(d) (2019) (TRACED Act).

<sup>2</sup> See 16 C.F.R. § 310.4(b)(1)(v).

<sup>3</sup> A copy of the TSR is attached as Attachment B.

- Initiating or causing the initiation of calls that deliver prerecorded messages,<sup>4</sup> unless the person called provided the seller express written permission to call (16 C.F.R. § 310.4(b)(1)(v)); and
- Initiating or causing the initiation of telemarketing calls to numbers listed on the National Do Not Call Registry, unless the person called provided express written permission to receive calls from the seller or the seller had an existing business relationship with the person called (16 C.F.R. § 310.4(b)(1)(iii)(B)).

The FTC can obtain civil penalties for TSR violations. Each illegal call is subject to a maximum civil penalty of \$50,120. *See* 16 C.F.R. § 1.98. In addition, a violation of the TSR is a violation of Section 5 of the FTC Act. *See* 15 U.S.C. §§ 6102(c), 57a(d)(3), 45(a). Accordingly, the FTC has authority to seek both preliminary and permanent injunctive relief to address TSR violations. *See* 15 U.S.C. § 53(b). The FTC may also seek the refund of money or payment of damages to address TSR violations. *See* 15 U.S.C. § 57b(b).

Combating illegal telemarketing is a top priority for the FTC, with a special emphasis on halting illegal robocalls.<sup>5</sup> We want you to be aware that the FTC has, for example, brought assisting and facilitating claims against technology companies that knowingly provided software and servers used by illegal robocallers, even though these technology companies did not contract directly with the illegal robocallers. *See FTC v. James B. Christiano*, Case No. 8:18-cv-00936 (C.D. Cal. May 31, 2018).

We also bring to your attention that the FTC has sued VoIP service providers for allegedly violating the TSR. In *FTC v. Educare*, the FTC alleged that defendant Globex Telecom, Inc. assisted and facilitated telemarketers it knew, or consciously avoided knowing, were violating the TSR’s prohibitions on calls delivering prerecorded messages. *See FTC v. Educare Centre Services, Inc.*, No. 3:19-cv-00196-KC (W.D. Tex. Dec. 3, 2019).<sup>6</sup> In September, 2020, Globex Telecom and its associates agreed to pay \$2.1 million to settle the FTC lawsuit, and Globex Telecom’s former CEO and President was banned from telemarketing to the U.S. and was subject to a permanent court order.<sup>7</sup> Similarly, in *FTC v. Alcazar Networks, Inc.*, the FTC alleged that Alcazar Networks, Inc. and its founder and sole owner assisted and facilitated telemarketers responsible for tens of millions of illegal telemarketing calls, including robocalls and spoofed calls that displayed “911” as the caller ID. *See FTC v. Alcazar Networks Inc., et al.*, No. 6:20-cv-2200 (M.D. Fla. Dec. 3, 2020).<sup>8</sup> As part of their settlement with the FTC in January 2021, the defendants agreed to a permanent injunction that prohibits similar

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<sup>4</sup> These calls are often referred to as “robocalls.”

<sup>5</sup> In 2022, the FTC received more than 2.7 million complaints about unwanted calls, including more than 1.61 million robocall complaints. The FTC maintains an interactive Tableau Public web page that publishes details about do not call complaints on a quarterly basis. *See* <https://public.tableau.com/profile/federal.trade.commission#!/vizhome/DoNotCallComplaints/Maps>.

<sup>6</sup> A copy of the FTC’s Amended Complaint is attached as Attachment C.

<sup>7</sup> *See* <https://www.ftc.gov/news-events/press-releases/2020/09/globex-telecom-associates-will-pay-21-million-settling-ftcs-first>.

<sup>8</sup> A copy of the FTC’s Complaint is attached as Attachment D.

misconduct in the future and requires them to screen and monitor their customers, as well as imposing a monetary penalty.<sup>9</sup>

The FTC has business educational materials that can assist you in complying with the TSR. See <https://www.ftc.gov/tips-advice/business-center/guidance/complying-telemarketing-sales-rule>.

In addition to FTC regulations and the FTC's actions against providers of VoIP services, you should also be aware that the United States Department of Justice (DOJ), state attorneys general, and other agencies have brought civil actions against VoIP companies and their owners. In two cases, DOJ alleged that the defendants were committing and conspiring to commit wire fraud by knowingly transmitting robocalls that impersonated federal government agencies.<sup>10</sup> In August 2020, a federal district court entered a permanent court order barring the defendants from conveying telephone calls into the U.S. telephone system.<sup>11</sup> State cases have had similar impacts.<sup>12</sup>

Within three business days, please send a message to FTC attorney Fil Maria de Banate via electronic mail at [fdebanate@ftc.gov](mailto:fdebanate@ftc.gov), certifying that Tata Communications (America) Inc. has ceased engaging in the activities described above that may subject it to liability under the TSR or the FTC Act. Please direct any inquiries regarding this letter to Mr. de Banate by email or by telephone at 216.263.3413.

Sincerely,



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Jon Miller Steiger  
Director

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<sup>9</sup> See <https://www.ftc.gov/news-events/press-releases/2020/12/ftc-takes-action-against-second-voip-service-provider>.

<sup>10</sup> See <https://www.justice.gov/opa/pr/department-justice-files-actions-stop-telecom-carriers-who-facilitated-hundreds-millions>.

<sup>11</sup> See <https://www.justice.gov/opa/pr/district-court-enters-permanent-injunction-shutting-down-telecom-carriers-who-facilitated>.

<sup>12</sup> For example, the Vermont and Michigan Attorneys General have brought successful actions against VoIP providers who route scam robocall traffic. See <https://ago.vermont.gov/blog/2022/08/02/vermont-joins-nationwide-anti-robocall-task-force>; <https://www.michigan.gov/ag/news/press-releases/2020/08/07/ag-nessel-announces-settlement-eliminating-telecom-carrier-responsible-for-illegal-robocalls>; [https://www.michigan.gov/documents/ag/Assurance\\_of\\_Voluntary\\_Compliance\\_-\\_All\\_Access\\_Telecom\\_FINAL\\_9-11-20\\_702047\\_7.pdf](https://www.michigan.gov/documents/ag/Assurance_of_Voluntary_Compliance_-_All_Access_Telecom_FINAL_9-11-20_702047_7.pdf).

Enclosures:

Attachment A (Chart of illegal robocalls)

Attachment B (TSR)

Attachment C (*Educare* Amended Complaint)

Attachment D (*Alcazar* Complaint)

# ATTACHMENT A

<b>Date of ITG Notification</b>	<b>Date of Call</b>	<b>Caller ID</b>	<b>Robocall Campaign Identifier</b>	<b>Link to Robocall Recording</b>	<b>Potential Violation</b>
10/12/2023	10/11/2023	18049439866	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1388325">https://portal.tracebacks.org/api/public/attachments/1388325</a>	16 C.F.R. § 310.4(b)(1)(v)
9/7/2023	9/5/2023	12174083391	Amazon-AuthorizeOrder-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1365824">https://portal.tracebacks.org/api/public/attachments/1365824</a>	16 C.F.R. § 310.4(b)(1)(v)
9/6/2023	9/5/2023	17705964703	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1365680">https://portal.tracebacks.org/api/public/attachments/1365680</a>	16 C.F.R. § 310.4(b)(1)(v)
9/6/2023	9/5/2023	17345504338	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1365678">https://portal.tracebacks.org/api/public/attachments/1365678</a>	16 C.F.R. § 310.4(b)(1)(v)
9/6/2023	9/5/2023	13134775439	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1365672">https://portal.tracebacks.org/api/public/attachments/1365672</a>	16 C.F.R. § 310.4(b)(1)(v)
8/28/2023	8/23/2023	12024181122	GovtImpers		16 C.F.R. § 310.4(b)(1)(v)
8/18/2023	8/17/2023	12064154985	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1361751">https://portal.tracebacks.org/api/public/attachments/1361751</a>	16 C.F.R. § 310.4(b)(1)(v)
8/18/2023	8/17/2023	17574247457	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1361747">https://portal.tracebacks.org/api/public/attachments/1361747</a>	16 C.F.R. § 310.4(b)(1)(v)
8/18/2023	8/17/2023	17575267247	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1361745">https://portal.tracebacks.org/api/public/attachments/1361745</a>	16 C.F.R. § 310.4(b)(1)(v)
8/18/2023	8/17/2023	15618428228	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1361739">https://portal.tracebacks.org/api/public/attachments/1361739</a>	16 C.F.R. § 310.4(b)(1)(v)
8/15/2023	8/12/2023	15134765884	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1360305">https://portal.tracebacks.org/api/public/attachments/1360305</a>	16 C.F.R. § 310.4(b)(1)(v)
8/14/2023	8/12/2023	12083882323	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1360311">https://portal.tracebacks.org/api/public/attachments/1360311</a>	16 C.F.R. § 310.4(b)(1)(v)
8/14/2023	8/12/2023	18006722231	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1360309">https://portal.tracebacks.org/api/public/attachments/1360309</a>	16 C.F.R. § 310.4(b)(1)(v)
8/14/2023	8/12/2023	18043445440	Utility-Impers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1360307">https://portal.tracebacks.org/api/public/attachments/1360307</a>	16 C.F.R. § 310.4(b)(1)(v)
8/8/2023	7/28/2023	18004321000	Financial-Impers-2		16 C.F.R. § 310.4(b)(1)(v)
7/21/2023	7/8/2023	18008693557	Financial-Impers-7		16 C.F.R. § 310.4(b)(1)(v)
7/21/2023	7/12/2023	18008693557	Financial-Impers-7		16 C.F.R. § 310.4(b)(1)(v)
7/21/2023	7/9/2023	18008693557	Financial-Impers-7		16 C.F.R. § 310.4(b)(1)(v)

7/6/2023	7/3/2023	18005727173	Chinese-Exit-Entry	<a href="https://portal.tracebacks.org/api/public/attachments/1338818">https://portal.tracebacks.org/api/public/attachments/1338818</a>	16 C.F.R. § 310.4(b)(1)(v)
5/30/2023	5/27/2023	17705926608	Amazon-Various-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1326261">https://portal.tracebacks.org/api/public/attachments/1326261</a>	16 C.F.R. § 310.4(b)(1)(v)
5/24/2023	5/23/2023	12105222626	Amazon-Various-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1323673">https://portal.tracebacks.org/api/public/attachments/1323673</a>	16 C.F.R. § 310.4(b)(1)(v)
5/4/2023	5/3/2023	131685667288	SSA-Impers	<a href="https://portal.tracebacks.org/api/public/attachments/1298020">https://portal.tracebacks.org/api/public/attachments/1298020</a>	16 C.F.R. § 310.4(b)(1)(v)
5/3/2023	5/2/2023	13096913653	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1296721">https://portal.tracebacks.org/api/public/attachments/1296721</a>	16 C.F.R. § 310.4(b)(1)(v)
5/1/2023	4/28/2023	12313861006	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1294786">https://portal.tracebacks.org/api/public/attachments/1294786</a>	16 C.F.R. § 310.4(b)(1)(v)
4/25/2023	4/21/2023	8136293717	CBP-GovtImpers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1285663">https://portal.tracebacks.org/api/public/attachments/1285663</a>	16 C.F.R. § 310.4(b)(1)(v)
4/3/2023	3/21/2023	8009895006	Chinese-PackageDelivery-P4		16 C.F.R. § 310.4(b)(1)(v)
3/28/2023	3/27/2023	8698994872	Verizon-Phishing		16 C.F.R. § 310.4(b)(1)(v)
3/24/2023	3/24/2023	8668994872	Verizon-Phishing		16 C.F.R. § 310.4(b)(1)(v)
3/21/2023	3/20/2023	8668994872	Verizon-Phishing		16 C.F.R. § 310.4(b)(1)(v)
2/28/2023	2/27/2023	7055329906	Financial-Impers-4	<a href="https://portal.tracebacks.org/api/public/attachments/1246788">https://portal.tracebacks.org/api/public/attachments/1246788</a>	16 C.F.R. § 310.4(b)(1)(v)
2/28/2023	2/27/2023	5798868397	Financial-Impers-4	<a href="https://portal.tracebacks.org/api/public/attachments/1246782">https://portal.tracebacks.org/api/public/attachments/1246782</a>	16 C.F.R. § 310.4(b)(1)(v)
2/28/2023	2/24/2023	5798868931	Financial-Impers-4	<a href="https://portal.tracebacks.org/api/public/attachments/1246779">https://portal.tracebacks.org/api/public/attachments/1246779</a>	16 C.F.R. § 310.4(b)(1)(v)
2/24/2023	2/21/2023	2163310163	CBP-GovtImpers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1243234">https://portal.tracebacks.org/api/public/attachments/1243234</a>	16 C.F.R. § 310.4(b)(1)(v)
2/23/2023	2/21/2023	2163310147	CBP-GovtImpers-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1243242">https://portal.tracebacks.org/api/public/attachments/1243242</a>	16 C.F.R. § 310.4(b)(1)(v)
1/4/2023	1/3/2023	0002562533	Chinese-PackageDelivery-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1195647">https://portal.tracebacks.org/api/public/attachments/1195647</a>	16 C.F.R. § 310.4(b)(1)(v)
1/4/2023	1/3/2023	0002562533	Chinese-PackageDelivery-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1195643">https://portal.tracebacks.org/api/public/attachments/1195643</a>	16 C.F.R. § 310.4(b)(1)(v)
1/4/2023	1/3/2023	0002562533	Chinese-PackageDelivery-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1195640">https://portal.tracebacks.org/api/public/attachments/1195640</a>	16 C.F.R. § 310.4(b)(1)(v)