



May 20, 2020

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

To: Franklin Fawzi
CEO
Intelepeer Cloud Communications LLC
155 Bovet Rd.
Suite 405
San Mateo, CA 94402

Re: Official Correspondence from the Federal Communications Commission and Federal Trade Commission

Dear Mr. Fawzi,

We have determined that Intelepeer Cloud Communications LLC (Intelepeer) is apparently originating Novel Coronavirus Disease (COVID-19) scam robocall traffic on behalf of one or more of its clients. **We request that you cease transmitting such traffic immediately.**

On March 13, 2020, the President declared a national emergency concerning the COVID-19 outbreak.¹ Fraudsters and unscrupulous actors have taken advantage of this national health crisis to send scam robocalls to consumers across the United States. These unwanted robocalls include prerecorded solicitations for debt relief or payment reduction services in connection with the COVID-19 pandemic. This activity has the potential to inflict severe harm on consumers. Our agencies will aggressively pursue legal action against unlawful robocallers and, where appropriate, pursue legal action against voice providers routing or transmitting such traffic on their networks.²

Investigations conducted by our agencies, in conjunction with the USTelecom Industry Traceback Group, revealed that Intelepeer identifies itself as the originating provider for apparently illegal COVID-19 robocalls originating from one or more of its clients, which your

¹ Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak, The White House (Mar. 13, 2020), <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>.

² The Federal Trade Commission recently obtained a temporary restraining order and a preliminary injunction against a VoIP provider, Globex Telecom, for assisting and facilitating illegal robocalls. <https://www.ftc.gov/news-events/press-releases/2019/12/court-halts-operations-voip-service-provider-after-ftc-ohio>.

company refused to identify. We note that your company's refusal to disclose to the Industry Traceback Group the names of the person(s) responsible for the unlawful calls makes it difficult for U.S. network providers to protect themselves against illegal robocall traffic from those sources. This is particularly problematic in the case of malicious robocalls capitalizing on public anxiety about the ongoing global health crisis. We will take all necessary and appropriate action to prevent these robocalls from entering U.S. networks.

If after 48 hours of issuance of this letter Intelepeer continues to route or transmit harmful robocall traffic from the entity/entities involved in these campaigns, the FCC will authorize other U.S. voice providers to block all calls from Intelepeer and take any other steps as needed to prevent further transmission of unlawful calls from Intelepeer, and we will evaluate whether further action is appropriate in connection with your activity.

Please direct any inquiries regarding this letter to Kristi Thompson of the FCC at Kristi.thompson@fcc.gov or 202-418-1318; or to James Evans of the FTC at james.evans@ftc.gov or 202-326-2026.

Sincerely,



Rosemary C. Harold
Chief, Enforcement Bureau
Federal Communications Commission



Lois C. Greisman
Associate Director, Division of Marketing
Practices
Federal Trade Commission