



PUBLIC NOTICE

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ROBOCALL ENFORCEMENT NOTICE TO ALL U.S.-BASED VOICE SERVICE PROVIDERS

FCC Enforcement Bureau Notifies All U.S.-Based Voice Service Providers of Rules Permitting Them to Block Calls Transmitting from Alliant Financial.

File No. EB-TCD-23-00035896

By the Chief, Enforcement Bureau:

The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) issues this *Public Notice* to notify all U.S.-based voice service providers of substantial amounts of apparently unlawful robocalls related to debt consolidation loans originating from Alliant Financial (Alliant). Pursuant to section 64.1200(k)(4) of the Commission's rules, we hereby notify all U.S.-based voice service providers that if Alliant fails to effectively mitigate illegal traffic, including the identified traffic described in the cease-and-desist letter (CDL) listed below and substantially similar traffic, within 48 hours of the date of this *Public Notice*, U.S.-based voice service providers may block voice calls or cease to accept traffic¹ from Alliant, without liability under the Communications Act of 1934, as amended, or the Commission's rules.²

Contemporaneous with this *Public Notice*, the Bureau is issuing a CDL to the following voice service provider:³

- **Alliant Financial**

Alliant—an originating voice service provider that does not appear to offer financial services—apparently originated a substantial volume of unlawful robocalls related to purported debt consolidation loans to wireless telephone numbers in apparent violation of the Telephone Consumer Protection Act (TCPA) and the Commission's implementing rules.⁴ Pursuant to the CDL, Alliant must: (1) promptly investigate the traffic identified in the CDL; (2) block or cease accepting the identified traffic and substantially similar traffic on an ongoing basis (unless it determines that the identified traffic is legal and provides a reasonable explanation to support that conclusion); and (3) report the results of the investigation to the

¹ A provider may not block a voice call if the call is an emergency call placed to 911. See 47 CFR § 64.1200(k)(5).

² *Id.* § 64.1200(k)(4) (permitting downstream providers to block calls from a notified provider that fails to either (a) effectively mitigate the identified traffic within 48 hours or (b) implement effective measures to prevent new and renewing customers from using its network to originate illegal calls).

³ Cease-and-Desist Letter from Loyaan A. Egal, Chief, Enforcement Bureau, to Mohammed Hossain, Member/Management, Alliant Financial (May 20, 2024) (Alliant CDL). This CDL is available on the Commission's website at <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist>.

⁴ See Traceback Consortium Subpoena Response (Dec. 11, 2023) (on file at EB-TCD-23-00035896) (December ITG Subpoena Response); Traceback Consortium Subpoena Response (Mar. 7, 2024) (on file at EB-TCD-23-00035896) (March ITG Subpoena Response); see also 47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii), (2). The CDL explains in detail the basis for our conclusion that Alliant originated the relevant calls in apparent violation of the TCPA and the Commission's rules.

Bureau within 14 days of the date of the CDL.⁵ If Alliant fails to comply with those requirements, the Bureau may ultimately issue a Final Determination Order, which would require downstream voice service providers to block and cease accepting all traffic from Alliant.⁶

The CDL also serves as notice to Alliant that downstream U.S.-based voice service providers may begin blocking all calls or cease accepting traffic from Alliant after notifying the Commission of their decision, and providing a brief summary of their basis for making such determination, if Alliant either (a) fails to effectively mitigate illegal traffic within 48 hours of the date of the CDL (which is the same as the date of this Public Notice) or (b) fails to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls within 14 days of the date of the CDL.⁷ **U.S.-based voice service providers may block ALL call traffic transmitting from Alliant’s network if it fails to act within either deadline.**

Purpose. Protecting individuals and entities from the dangers of unwanted and illegal robocalls is the Commission’s top consumer protection priority.⁸ As part of its multi-pronged approach to combatting illegal robocalls, the Commission has taken steps to encourage voice service providers to block suspected illegal robocalls.⁹ The Commission permits voice service providers to block traffic from other voice service providers that the Bureau has warned are originating or transmitting suspected illegal robocalls, if the warned voice service provider fails to take appropriate and timely action to mitigate such traffic.¹⁰ The Bureau has issued numerous “cease-and-desist” letters, warning voice service providers that they were originating or transmitting suspected illegal robocalls and could be subject to blocking.¹¹ The Bureau may also ultimately order voice service providers that are immediately downstream to cease accepting traffic from an upstream voice service provider that does not comply with the Commission’s rules.¹²

Nature of Apparently Unlawful Robocall Traffic. USTelecom’s Industry Traceback Group (ITG)¹³ conducted tracebacks on 13 calls, identified in Attachments A and B to the CDL, placed to wireless

⁵ See Alliant CDL at 6-7; see also 47 CFR § 64.1200(n)(2)(i)(A).

⁶ 47 CFR § 64.1200(n)(2)-(3).

⁷ *Id.* § 64.1200(k)(4).

⁸ *Consumer Guide: Stop Unwanted Robocalls and Texts*, Fed. Comm’n’s Comm’n, <https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts> (last visited Apr. 12, 2024) (“Unwanted calls – including illegal and spoofed robocalls - are the FCC’s top consumer complaint and our top consumer protection priority.”).

⁹ See 47 CFR § 64.1200(k); see, e.g., *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking, 35 FCC Rcd 7614, 7622, para. 19 (2020) (*July 2020 Call Blocking Order*) (establishing safe harbor for blocking traffic from bad-actor upstream providers); *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, CG Docket No 17-59, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, 34 FCC Rcd 4876, 4887-88, paras. 34-46 (2019) (blocking based on reasonable analytics with consumer opt-out and consumer whitelists); *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9706, 9709, para. 9 (2017) (blocking of certain categories of calls highly likely to be illegal).

¹⁰ See *July 2020 Call Blocking Order*, 35 FCC Rcd at 7628-29, paras. 36-39; 47 CFR § 64.1200(k)(4).

¹¹ These CDLs are available on the Commission’s website at <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist>.

¹² 47 CFR § 64.1200(n)(2)-(3).

¹³ 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, DA 23-719, 2023 WL 5358422, at *1, para. 1 (EB Aug. 18, 2023).

numbers between November 10, 2023 and February 3, 2024.¹⁴ The calls delivered prerecorded messages purportedly related to debt consolidation loans and claimed to be from “One Street Financial,” “Main Street Financial,” and “Alliant Financial.”¹⁵ The use of the latter two names risks confusion for consumers because the names are similar to the names of entirely unrelated financial entities: (1) MainStreet Financial Services; and (2) Alliant Financial Solutions. Both companies have posted warnings on their websites that their names are being used by another party to make “spam type calls offering lending services.”¹⁶

These 13 tracebacks appear to be a subset of a vast and relentless campaign of “debt consolidation” calls.¹⁷ Many consumers reported being contacted multiple times, which caused frustration and annoyance and hampered their ability to use their phones.¹⁸ Consumers who returned calls from Alliant Financial, Main Street Financial, and One Street to request removal from the entities’ calling lists assert that they continued to receive an influx of calls despite these requests.¹⁹

Campaigns of this nature, however, are not only nuisances, they are often scams to obtain personal information or illegal upfront payments and often do not consolidate debt or otherwise improve the consumer’s financial situation.²⁰ Veterans and service members, in particular, are vulnerable to such

¹⁴ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4.

¹⁵ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4.

¹⁶ See Alliant Financial Solutions, <https://www.alliantfinancialsolutions.com/> (last visited Apr. 4, 2024) (screenshot on file at EB-TCD-23-00035896) (“Alliant Financial Solutions is aware that another company is using the name ‘Alliant Financial’ and making spam type calls offering lending services. Alliant Financial Solutions will never make unsolicited calls.”); MainStreet Financial Services, <https://www.mainstreetfinancialservices.com/> (last visited Apr. 2, 2024) (screenshot on file at EB-TCD-23-00035896) (“For those receiving multiple daily calls from a ‘Main Street Financial’ regarding debt consolidation from (855) area code number or other numbers. THIS IS NOT OUR FIRM.”).

¹⁷ See *Daily Call Volume per Campaign*, YouMail, Inc., <https://app.sigmacomputing.com/youmailinc/workbook/> (last visited Mar. 19, 2024) (screenshot on file at EB-TCD-23-00035896).

¹⁸ See, e.g., FCC Complaint # 6598935 (Nov. 22, 2023) (on file at EB-TCD-23-00035896) (“Alliance [sic] Financial Bogus Company I am receiving multiple calls every day from different numbers with the message, ‘Alliant Financial our records indicate you have a pre-approval which is set to expire from one of our partners of up to 100,000 dollar personal loan to speak with a member of our team please press 2 to speak to . . .’ My voicemail is constantly full of their messages and others who I want to talk to are unable to leave me a message. How do I stop the calls?”); FCC Complaint # 6731862 (Jan. 29, 2024) (on file at EB-TCD-23-00035896) (“I have been receiving calls from ‘Brian at Main Street financial’ multiple times a day for months now. I block the number but they call back shortly after using a similar number. The calls come in 7 days a week from 7am until 9pm. Please help.”); FCC Complaint # 6736964 (Jan. 31, 2024) (on file at EB-TCD-23-00035896) (“Several times a day from several different numbers I get ‘Sarah’ from One Street Financial calling me about a debt consolidation loan that expires at the end of 2023. It WONT stop. I have blocked 20+ different [sic] numbers and each time they leave a message on the voice mail. I have enabled my cell phone carriers scam shield. Nothing helps.”).

¹⁹ See, e.g., FCC Consumer Complaint #6576747 (Nov. 11, 2023) (“I have been getting calls from a company called ‘Alliant Financial’ I have tried to ask them multiple times to remove me from their call list and they just hang up the phone or act very rude.”); FCC Consumer Complaint #6664167 (Dec. 28, 2023) (Main Street financial. Call from multi [sic] numbers. Have asked to be removed multiple times over several months and calls continue”); FCC Consumer Complaint #6820086 (“One street financial calls me up to 10 times a day. It’s been going on for months. I have called and requested to be taken off their call list and they just will not remove me. I have blocked their number but then they call from a different number.”).

²⁰ See *How to Get Out of Debt*, Fed. Trade Comm’n, <https://consumer.ftc.gov/articles/how-get-out-debt#Credit%20Repair> (last visited Apr. 4, 2024) (discussing signs that a consumer is dealing with a debt settlement scam); Ana Staples, *How to avoid a debt settlement scam—and get the help you need*, CNBC (June 8, 2023), <https://www.cnbc.com/select/how-to-avoid-a-debt-settlement-scam/>; Emily Cahill, *Signs of Debt Settlement Scams to Watch For*, Experian (Mar. 8, 2023), <https://www.experian.com/blogs/ask-experian/signs-of-debt-settlement->

(continued....)

campaigns because predatory lenders target them more frequently.²¹ Falling prey to such scams can be destructive to Veterans and their families as “studies have confirmed a link between troubled financial status and poor physical and mental health in veterans.”²² Financial stressors have similarly damaging effects on active duty soldiers.²³ These types of calls pose a significant threat to the safety of the financial and personal identifying information of the public, and in particular, Veterans, active duty service members, and their families.

The ITG investigated the calls described in Attachments A and B to the CDL and determined that Alliant was the originating provider.²⁴ The ITG notified Alliant of these calls and provided the Company with supporting data identifying each call.²⁵ Alliant did not contest that it had originated the calls and identified one client as the source of all of the calls.²⁶ The Bureau was unable to reach Alliant at the physical address Alliant lists in the Commission’s Robocall Mitigation Database (RMD),²⁷ and the Bureau’s emails to the email address Alliant lists in the RMD remain unanswered.²⁸

Alliant failed to provide sufficient evidence of consent for any of the calls identified in Attachments A and B to the CDL. For six of the calls, Alliant claimed that its customer who initiated the calls had prior consent, which it purportedly obtained through opt-in webpages.²⁹ Despite this claim, Alliant provided no evidence of such prior express written consent for the identified calls.³⁰ For the remaining seven calls, Alliant provided videos of online consent forms supposedly being filled out by consumers with their names and numbers.³¹ The numbers in these forms, however, were assigned to Verizon’s *internal* collection of wireless numbers, *i.e.*, they were not assigned to any subscriber.³² As such, no subscriber

[scams/](#); see also *What is a Debt Consolidation Loan? Does Debt Consolidation Hurt Your Credit?*, Equifax, <https://www.equifax.com/personal/education/debt-management/articles/-/learn/what-is-debt-consolidation/> (last visited Mar. 28, 2024).

²¹ See Eric B. Elbogen et al., *Financial Status and Well-being in Recently Separated Military Veterans*, 188 Mil. Med. e2181, e2182 (2023), <https://academic.oup.com/milmed/article/188/7-8/e2181/6540063>.

²² See *id.*

²³ See *id.*

²⁴ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4.

²⁵ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4.

²⁶ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4.

²⁷ See Affidavit of Attempted Service of {{ [REDACTED] }}, Director of Operations, United Processing, Inc., (Mar. 18, 2024) (on file at EB-TCD-23-00035896). Material set off by double brackets {{ [REDACTED] }} is confidential and redacted from the public version of this document.

²⁸ See Email from Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau, to Mohammad Hossain, Member/Management, Alliant Financial (Mar. 11, 2024) (on file at EB-TCD-23-00035896); see also Email from Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, FCC Enforcement Bureau, to Mohammad Hossain, Member/Management, Alliant Financial (Mar. 12, 2024) (on file at EB-TCD-23-00035896). The Bureau did not receive a response to either email.

²⁹ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4; see also 47 CFR § 64.1200(a)(2)-(3) (describing requisite consent levels).

³⁰ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4.

³¹ See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4.

³² See December ITG Subpoena Response, *supra* note 4; March ITG Subpoena Response, *supra* note 4; see also *Verizon Works with Wireless Carriers in US to Combat Robocalls*, Verizon News Center, <https://www.verizon.com/about/news/verizon-carriers-combat-robocalls> (last visited Apr. 12, 2024) (describing “honeypots”).

could have consented to have those numbers called.³³ Accordingly, these calls were apparently illegal, and Alliant is responsible for allowing these apparently unlawful calls to originate on its network.

Potential Further Enforcement Action. The Bureau may issue an Initial Determination Order stating the Bureau's initial determination that Alliant is not in compliance with section 64.1200 of the Commission's rules if: (a) Alliant fails to respond to the CDL; (b) Alliant provides an insufficient response; (c) Alliant continues to originate substantially similar traffic or allow substantially similar traffic onto the U.S. network after the 14-day period identified above; or (d) the Bureau determines the traffic is illegal despite Alliant's assertions to the contrary.³⁴ If the Bureau issues an Initial Determination Order, Alliant will have an opportunity to respond.³⁵ If Alliant does not provide an adequate response to the Initial Determination Order or continues to originate or allow substantially similar traffic onto the U.S. network, the Bureau may issue a Final Determination Order in EB Docket No. 22-174 concluding that Alliant is not in compliance with section 64.1200 of the Commission's rules.³⁶ **In the event that the Bureau issues a Final Determination Order in this matter, pursuant to section 64.1200(n)(3) of the Commission's rules, all U.S.-based voice service providers shall be required to block Alliant's traffic beginning 30 days from the release date of the Final Determination Order.**³⁷

Contact Information. For further information, please contact Kristi Thompson, Division Chief, Telecommunications Consumers Division, Enforcement Bureau at Kristi.Thompson@fcc.gov or Daniel Stepanicich, Assistant Division Chief, Telecommunications Consumers Division, Enforcement Bureau at Daniel.Stepanicich@fcc.gov.

ENFORCEMENT BUREAU
Loyaan A. Egal
Chief

³³ Further, with regards to one of the videos purporting to show consent, the inputted number does not match the number called. See December ITG Subpoena Response, *supra* note 4. The consent form supplied showed an inputted number of {[]} while the called number was {[]}. *Id.*

³⁴ 47 CFR § 64.1200(n)(2)(ii).

³⁵ *Id.*

³⁶ *Id.* § 64.1200(n)(2)(iii), (3); *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 Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, FCC 23-37, 2023 WL 3686042, at *11, para. 37 (May 19, 2023).

³⁷ 47 CFR § 64.1200(n)(3). Providers must monitor EB Docket No. 22-174 and initiate blocking beginning 30 days from the release date of the Final Determination Order. *Id.*