

***** CEASE AND DESIST NOTICE *****

18 June 2023

TO:

Xpertelecom Corporations

Contact: Zarish Hafeez Title: Ms. Dept: Abuse Dept.
Address: 9558 John Locke Way | Owings Mills MD 21117
Email: support@xpertelecom.com Tel: 6674015516

MS TEL Corp.

Contact: Shoaib Khalid Title: CEO Dept: Executive
Address: 9558 John Locke Way, | Owings Mills MD 21117
Email: shoaib@mstelcorp.com Tel: 6673091077

TEL X NETWORKS

Contact: Z Nawab Title: Mr Dept: Abuse Dept.
Address: 4877 MONTGOMERY RD | ELLICOTT MD 21043
Email: abuse@telxnetworks.com Tel: 4439735717

VAULT SYSTEMS LLC

Contact: Ali AIJAZ Title: VAULT SYSTEMS LLC Dept: support
Address: 30 N Gould St Ste R, Sheridan, WY 82801, | Herschler Bldg East WY 82801
Email: ali.aijaz@vaultsystemsllc.com Tel: 6515648831

Telcast Network, LLC

Contact: Talal Khalid Title: CEO Dept: Executive
Address: 8 The Green, Suite #7044 | Dover DE 19901
Email: tkhalid@telcastnetworks.com Tel: 3022327575

Dear Listed Voice Service Providers,

DEMAND: This letter is to serve notice that I believe you are, collectively, facilitators of a prolific number of fraudulent robocalls targeted at United States residents. I insist that you immediately CEASE AND DESIST from facilitating such calls to ME and to ALL OTHER users of the United States Public Telephone Network, including not just calls similar to those described herein, but other FRAUDULENT calls and all calls NOT IN COMPLIANCE with ALL applicable regulations.

BACKGROUND: For years, I have been deluged with unwanted robocalls to my several telephone numbers, which include mobile and non-mobile services for personal, professional and combined purposes. In order to better track these calls, I deployed a robocall surveillance platform called RRAPTOR which passively waits for calls and when received, answers and analyzes them. Telephone numbers in the pool monitored by RRAPTOR are assigned to me. They are not published; nothing is done to solicit calls to these numbers. Many of the numbers are on the federal Do-Not-Call list. RRAPTOR is fully automated; the call metadata and audio recordings it gathers are not subject to human interpretation.

ANALYSIS: Each day RRAPTOR receives thousands of calls and stores data about each one in its database. I am able to query that database in a variety of ways to identify calling patterns, discern trends, and correlate my findings to what I hear on telephone calls that I answer personally as well as reports I get from others about calls they receive.

In July of 2022, RRAPTOR answered 5 calls that all played this message:

Hello. This is a call from your utility company. You have been paying more than your consumption from the previous few months. You will be compensated by \$50, along with 35% reduction on your electric and gas bill. Please press one to get your compensation.

The pace of calls increased, with 1,540 calls received in October of 2022, and 3,469 received in May of this year. RRAPTOR has received a total of 14,987 calls as of today. The calls were placed to 1,807 different called numbers monitored by RRAPTOR. These calls appear fraudulent. The name of the entity responsible for the call is not identified. The calls are being placed to area codes representing locations all over the country (more than 250, associated with all 49 continental states and DC except North Dakota). We are aware of no utility that makes a legitimate offer such as described in the message.

The calls purport to come from 14,965 different telephone numbers, including telephone numbers served by major wireless providers including Verizon, AT&T and T-Mobile. For all but 10 calls, the area code of the calling number matched the area code of the called number. It appears that the calling numbers are chosen pseudo-randomly to achieve this result and have no relation to the party actually placing each call.

CALL VOLUME: It is impossible for me to know with certainty the number of similar calls received by other Americans and, presumably, facilitated by you. However, based on my data showing that at present, a few hundred of my numbers capture several thousand of these calls each month, I estimate that this campaign is placing well over a million calls each week and perhaps at times approaches a million calls in a single day.

TRACEBACK RESULTS: Over the months that I have been receiving these calls, I have periodically asked USTelecom's Industry Traceback Group (ITG, the entity designated by the FCC as the Registered Consortium for Traceback) to determine the source(s) of example calls. The results of those efforts are summarized in Attachment A to this letter.

Those results reveals your collective involvement in these calls and show that:

- 1) When the originating provider responds to the traceback, they claim to have terminated the calling party (implicitly acknowledging, we believe, the fraudulent nature of the call).
- 2) The calling party changes with each traceback, but is typically in Pakistan and often uses an "@gmail.com" email address.
- 3) On numerous occasions, MS TEL, TEL X, and Xpertelecom failed to respond to the traceback request, despite regulations that mandate timely traceback responses.

COMPLIANCE FAILURES: Separately and collectively, Telcast, VAULT, Xpertelecom, MS TEL, and TEL X are failing to comply with numerous regulations meant to protect Americans from malicious robocalls.

- A. The tracebacks have put each of you on notice regarding the calls moving through your networks, including sample content and examples of maliciously-spoofed calling numbers.

- B. All voice service providers are required to comply with traceback requests. On several occasions, Xpertelecom and TEL X networks have failed to do so.
- C. ALL voice service providers are required to take effective measures to prevent new and renewing customers from originating calls via their networks. Despite your claims that you shut down the caller, identical calls continue, seemingly without even a pause.
- D. As of July 1, 2022, all non-facilities-based voice service providers are required to sign the calls they originate using the STIR/SHAKEN call authentication framework. None of the calls in our sample were signed by the originating provider.
- E. In your filings in the Robocall Mitigation Database, you certified that you were NOT signing some or all of your calls. Your co-filed Robocall Mitigation Plan must, in that case, explain on what basis you are not signing. But your plans (shown in Attachment B to this letter) offer no such explanation.

COLLUSION: I am writing to the five of you in part because you appear to be operating collaboratively to facilitate these calls and to obfuscate responsibility for them. Frequently two or more of you are involved in the initial steps of putting the calls onto the network. Further, I note that all of your Robocall Mitigation Plans are remarkably similar, as if they were crafted by the same individual(s) and or copied from each other. Two of you share the same physical address per the Robocall Mitigation Database.

POOR STEWARDSHIP: Even if each of you is working at arms-length, you individually have a responsibility to avoid polluting the United States Public Telephone Network with fraudulent calls. Upon receipt of the very first tracebacks, months ago, it was incumbent on each of you to investigate the source of the calls and to take more than cursory mitigation steps. When serving as the originating provider, you needed to be (a) signing your calls, (b) responding to tracebacks, and (c) preventing new customers from accessing your service to place high volumes of illegally spoofed fraudulent calls. To the extent you were serving as an intermediate provider, it was incumbent on you to act to ensure that your upstream call source(s) was taking the steps enumerated above with respect to originating provider responsibilities – especially when you were getting a steady stream of tracebacks regarding repeated calls from the same sources.

SERVICE: I am sending this Notice to you via email to the addresses you have each listed in the Robocall Mitigation Database. Further, prior to publishing this Notice broadly, I am inviting each of you to advise me of any misstatements in the Notice, and also to provide your own remarks or a link for me to include alongside this Notice.

Again: I insist that you immediately CEASE AND DESIST from facilitating such calls to ME and to ALL OTHER users of the United States Public Telephone Network, including not just calls similar to those described herein, but other FRAUDULENT calls and all calls NOT IN COMPLIANCE with ALL applicable regulations.

Regards,

/s/ David Frankel
CEO, ZipDX LLC
Saint George, Utah
+1 800 372 6535 / dfrankel@zipdx.com

Attachment A

TRACEBACK RESULTS

Call Date ITG ID	Audio Link	Next Provider(s), Per ITG	1st Provider, Per ITG	1st Provider Response	Identified Caller	Address
24-Oct 2022 10985	Link	Telcast Network / Voovertel MS TEL Corp.	Xpertelecom Corporations (Owings Mills, MD)	Terminated calling party service, Client Terminated	Virtual Marketing ramish@ virtualmarketing.com	Address: St 3, Makah Colony , City: Lahore , State: Punjāb , Zip: 54000 , Country: Pakistan
24-Oct 2022 10986	Link	Telcast Network / Voovertel	VAULT SYSTEMS LLC (Sheridan, WY)	Terminated calling party service, We have terminated the service immediately.	Maverick Global Services mian.kumdsail373@ gmail.com	Address: office no 405 4th floor Al Hafeez Shopping Mall Main Boulevard Road , City: Lahore , State: Punjāb , Zip: 54000 , Country: Pakistan
7-Dec 2022 11545	Link		VAULT SYSTEMS LLC (Sheridan, WY)	Terminated calling party service, We have terminated the service immediately	RisingTech Solutions pvt ltd tayyabalam91@ gmail.com	Address: MM Alam Road ALi Plaza , City: Lahore , State: Punjāb , Zip: 54660 , Country: Pakistan
7-Dec 2022 11544	Link		VAULT SYSTEMS LLC (Sheridan, WY)	Terminated calling party service, We have terminated the service immediately.	transglo zeeshan@ wnkassociates.com	Address: Gulberg , City: Lahore , State: Punjāb , Zip: 54660 , Country: Pakistan
28-Dec 2022 11715	Link	Telcast Network / Voovertel TEL X NETWORKS	Xpertelecom Corporations (Owings Mills, MD)	Terminated calling party service, Services terminated	Ethereus Global wasuu.malik@ gmail.com	Address: 261 NW 34th St , City: Miami , State: Florida , Zip: 33127 , Country: United States
11-Jan 2023 11830	Link	TEL X NETWORKS	Xpertelecom Corporations (Owings Mill, MD)	NO RESPONSE		
17-Jan 2023 11883	Link	TEL X NETWORKS	Xpertelecom Corporations (Owings Mill, MD)	NO RESPONSE		
7-Mar 2023 12477	Link	Telcast Network / Voovertel TEL X NETWORKS	Xpertelecom Corporations (Owings Mills, MD)	Terminated calling party service, We have terminated the client	Sybrid PVT awais.hassan@ sybrid.com	Address: Plot 89, Street 10 I-9/2 , City: Islamabad , State: Islāmābād , Zip: 44800 , Country: Pakistan
27-Mar 2023 12732	Link	Telcast Network / Voovertel	TEL X NETWORKS (Ellicott City, MD)	Terminated calling party service, Terminated Client	InterTech Global theintertech@ gmail.com	Address: office 3F New Liberty Tower Model Town Link Rd , City: Lahore , State: Punjāb , Zip: 54000 , Country: Pakistan
12-Apr 2023 12912	Link	Xpertelecom Corporations	TEL X NETWORKS (Ellicott City, MD)	Terminated calling party service, Terminated Client	Hikites Services seniorcloser@ gmail.com	Address: 24 Tariq Block New Garden town , City: Lahore , State: Punjāb , Zip: 54000 , Country: Pakistan
27-Apr 2023 12133	Link	MS TEL Corp.	Xpertelecom Corporations (Owings Mill, MD)	NO RESPONSE		
27-Apr 2023 12132	Link	MS TEL Corp.	Xpertelecom Corporations (Owings Mill, MD)	NO RESPONSE		
4-May 2023 13232	Link	Telcast Network / Voovertel	MS TEL Corp. (Owings Mill, MD)	NO RESPONSE		
10-May 2023 13344	Link	MS TEL Corp.	Xpertelecom Corporations (Owings Mill, MD)	NO RESPONSE		

10-May 2023 13343	Link	Telcast Network / Voovertel MS TEL Corp.	Xpertelecom Corporations (Owings Mill, MD)	Terminated calling party service, Terminated Client	Maveran 1 mian.kumail373@ gmail.com	Address: 2nd floor Al hafeez View , City: Lahore , State: Punjab , Zip: 54000 , Country: Pakistan
22-May 2023 13467	Link	Telcast Network / Voovertel, MS TEL Corp.	Xpertelecom Corporations (Owings Mills, MD)	Terminated calling party service, Terminated Client	Voice Global Services techronglobalservices@ gmail.com	Address: 227 Block n Model Town , City: Lahore , State: Punjab , Zip: 54000 , Country: Pakistan
31-May 2023 13593	Link	Telcast Network / Voovertel	TEL X NETWORKS (Ellicott City, MD)	NO RESPONSE		
31-May 2023 13592	Link	Telcast Network / Voovertel	TEL X NETWORKS (Ellicott City, MD)	NO RESPONSE		

Attachment B
ROBOCALL MITIGATION PLANS

First Page of Each Provider's Plan
Filed in the FCC's Robocall Mitigation Database
Captured 18-June 2023

Telcast Network LLC
Robocall Mitigation Efforts
2/18/2022

1. Telcast Network LLC commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls, and that none of the voice traffic that originates on its network is currently authenticated with STIR/SHAKEN and instead that all of the voice traffic that originates on its network is subject to this robocall mitigation program.
2. Using the questionnaire and onboarding procedures attached, Telcast Network LLC screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
3. Telcast Network LLC will block services to a customer if it determines that the customer is using the services for illegal robocalling.
4. Telcast Network LLC will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021.

Tel X Networks
Robocall Mitigation Efforts
3/2/2022

1. Tel X Networks commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls, and that none of the voice traffic that originates on its network is currently authenticated with STIR/SHAKEN and instead that all of the voice traffic that originates on its network is subject to this robocall mitigation program.
2. Using the questionnaire and onboarding procedures attached, Tel X Networks screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
3. Tel X Networks will block services to a customer if it determines that the customer is using the services for illegal robocalling.
4. Tel X Networks will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021.

MS TEL Corp.

Robocall Mitigation Efforts

9/03/2021

1. MS TEL Corp. commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls, and that none of the voice traffic that originates on its network is currently authenticated with STIR/SHAKEN and instead that all of the voice traffic that originates on its network is subject to this robocall mitigation program.
2. MS TEL Corp. Screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
3. MS TEL Corp. will block services to a customer if it determines that the customer is using the services for illegal robo-calling.
4. MS TEL Corp. will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021

XPERTELECOM CORPORATION
Robocall Mitigation Efforts
12/17/2021

- 1. XPERTELECOM CORPORATION** commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls, and that none of the voice traffic that originates on its network is currently authenticated with STIR/SHAKEN and instead that all of the voice traffic that originates on its network is subject to this robocall mitigation program.
- 2. XPERTELECOM CORPORATION** Screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
- 3. XPERTELECOM CORPORATION** will block services to a customer if it determines that the customer is using the services for illegal robo-calling.
- 4. XPERTELECOM CORPORATION** will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021

VAULT SYSTEMS LLC
Robocall Mitigation Efforts
9/8/2022

1. Vault systems LLC commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls, and that none of the voice traffic that originates on its network is currently authenticated with STIR/SHAKEN and instead that all of the voice traffic that originates on its network is subject to this robocall mitigation program.
2. Using the questionnaire and onboarding procedures attached, Vault systems LLC screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
3. Vault systems LLC will block services to a customer if it determines that the customer is using the services for illegal robocalling.
4. Vault systems LLC will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021.