

Robocall Mitigation Certification (Reinstatement Filing)

Company Name: A.T.C. Voice Data Inc.

FCC FRN: 0031776164

RMD#: RMD0010499

Business Address: 46 Center Avenue, Atlantic Highlands, NJ 07716

Certification Statement (per 47 CFR § 64.6305(a)(1))

I, the undersigned officer of A.T.C. Voice Data Inc. hereby certify as follows:

1. STIR/SHAKEN Implementation

A.T.C. Voice Data Inc. is a reseller of Re-Invent Telecom (RMD0004216) and Core Dial (RMD0002771) and does not have the capability to implement STIR/SHAKEN in our network. All calls we originate are authenticated and verified by our Hosted VoIP Providers in compliance with § 64.6301(a)(1) and (2).

2. Robocall Mitigation Program

In addition to STIR/SHAKEN implementation, A.T.C. Voice Data Inc. maintains and enforces a Robocall Mitigation Program consistent with § 64.6305(a), which includes:

- **Know Your Customer (KYC):** Verification of business name, service address, contact information, and intended use prior to activation. No customer is activated until legitimacy checks are completed.
- **Customer Limitations:** Service is sold only to U.S. businesses with a physical presence in the United States.
- **Ongoing Monitoring:** Post-activation traffic is continuously monitored using internal tools integrated with our PBX and alerting systems. Suspicious traffic patterns (e.g., high call volumes, abnormal destinations) trigger immediate alerts and review.
- **Upstream Providers:** We exclusively use intermediate providers that are registered in the FCC Robocall Mitigation Database. We will not accept traffic from any provider that is not listed in the Database.

3. Traceback Cooperation

A.T.C. Voice Data Inc. commits to responding to all traceback requests within 24 hours from the Commission, law enforcement, or the registered industry traceback consortium, and will fully cooperate in investigating and preventing illegal robocalls.

4. Enforcement History

1. Description of the Action or Investigation: On August 25, 2025, the FCC's Enforcement Bureau ("Bureau") issued an order that removed A.T.C. Voice Data Inc. ("A.T.C."), along with over 1,200 providers (collectively, "Companies") from the FCC's Robocall Mitigation Database ("RMD"). See Robocall Mitigation Database Filers, EB-ECD-25-00038590, Order, DA-25-737 (E.B. rel. Aug 25, 2025) ("Removal Order"). The Removal Order was effective upon its release and stated that A.T.C.'s RMD certification was "deficient because: (a) a Robocall Mitigation Plan ("RMP") was not provided or the plan lacks information required to be submitted by February 26, 2024, and (b) the certification lacks information required by that same date." Removal Order, at para. 1, Prior to the Removal Order, on December 10, 2024, the Bureau issued an order affording A.T.C., "a final opportunity to cure the deficiencies in their RMD certification and notify the Bureau that the deficiencies have been cured; or to file a response with sufficient explanation for why the Bureau should not remove the Company's certification from the RMD. The Removal order held that "the Companies failed to do either," which prompted the Removal Order and its final determination. The Removal Order stated that "removal of a Company's certification from the RMD requires all intermediate providers and voice service provider to cease accepting all calls directly from the Company and that Companies identified in Appendix A (which included A.T.C.) shall not re-file an RMD certification without the prior approval of the FCC's Wireline Competition Bureau (WCB) and the Bureau. A.T.C. did not respond to the December 10, 2024, Show Cause Order and notice because A.T.C. had not revised the contact information in their RMD certification and the notice was sent to an incorrect email address. Promptly after the Removal Order was released, A.T.C. addressed the issues that caused it to be included in the Removal Order (and December 10, 2024, Show Cause Order) and sought approval of the WCB and Bureau to re-file this cured RMD certification and attached RMP. In a subsequent notice on March 25, 2026, from the Bureau, stated, "As an initial matter, Commission staff have identified the following deficiencies in the Company's filing:
 - A. The Company does not answer "yes" in the field that asks providers whether they have been subject to a "formal Commission, law enforcement, or regulatory agency action or investigation . . ." **Note:** The removal orders issued on August 6, 2025, and August 25, 2025, fall under this category. Once "yes" is selected, the Company must provide a description of the action or investigation in the next field. This field asks for multiple pieces of information that the Company must provide a description for.

- B. The Company's STIR/SHAKEN attestation is inconsistent because it attests to partial STIR/SHAKEN implementation but the Company does not appear to be on the Secure Telephone Identity Policy Administrator (STI-PA)'s list of authorized providers. A provider certifying to complete STIR/SHAKEN implementation in the RMD must be registered with the STI-PA, obtain its own SPC token and digital certificate, and authenticate all its calls with that certificate, whether directly or through a third party. *See* 47 CFR §§ 64.6301, 64.6302; *Call Authentication Trust Anchor*, WC Docket No. 17-97, Eighth Report and Order, 39 FCC 12894, 12916, para. 30 (2024).
- C. The Company's STIR/SHAKEN attestation is inconsistent because it attests to partial STIR/SHAKEN implementation but the company did not provide its Operating Company Number (OCN). A provider must include an OCN on its RMD filing, if it has one. *See* 47 CFR §§ 64.6305(d)(4)(vii), (e)(4)(vii), (f)(4)(vii). The policy of the Secure Telephone Identity Governance Authority (STI-GA) requires providers to obtain an OCN in order to obtain the SPC token necessary to implement STIR/SHAKEN, unless the company is a Resp Org. *See* STI-GA, Policy Decision Binder, Version 9.1, at 5, <https://cdn.atiss.org/sti-ga.atiss.org/2026/01/14175322/260113-STIGA-Board-Policy-Decision-Binder-v9-1-1.pdf>.

On April 6, 2026, A.T.C. acknowledged the errors and responded to the Bureau that A.T.C. is a reseller of voice services from a wholesale hosted VoIP provider and that it does not have an OCN and that Option 3 should have been selected. On April 10, 2026, the Bureau acknowledged receipt of the RMD certification updates but requested more specific information describing the action or investigation and a valid extension or exemption as to the STIR/SHAKEN attestation. These corrections are provided herewith and incorporated into the RMD and RMP.

- 2. All law enforcement or regulatory agencies involved: It was only the FCC's Enforcement Bureau. No other regulatory or law enforcement agencies were involved.
- 3. The date that any action or investigation was commenced: The action was commenced on December 10, 2024, which was the date the Show Cause Order was released. Because the RMD was not cured as required by the Show Cause Order, the Bureau released its Removal Order on August 25, 2025.
- 4. The current status of the action or investigation: The Removal Order was the latest formal action taken against A.T.C. Subsequent requests from the Bureau have been addressed.
- 5. A summary of the findings of wrongdoing made in connection with the action or investigation: The Removal Order held the A.T.C.'s filing in the RMD (along with over 1,200 other Companies, as noted above) was deficient because (a) an RMD was not provided or the plan lacks information required to be submitted by February 26, 2024; and (b) the certification lacks information required by the same date. Removal Order, at para. 1.

6. Whether any final determinations have been issued: The Removal Order was a final determination; however promptly after the Removal Order was released, A.T.C. addressed the issues that caused it to be included in the Removal Order (and December 10, 2024 Show Cause Order) and sought approval of the WCB and Bureau to re-file its cured RMD certification and RMP. The Bureau Staff allowed A.T.C. to re-file and subsequently requested additional clarification and descriptive data which has now been provided. The re-instatement request is pending further review as of April 17, 2026.

The filing has now been corrected.

5. Supplemental Information

Business Name(s): A.T.C. Voice Data Inc.

Foreign Voice Service Provider: No

Other FRNs: None

Operating Company Number (OCN): No

Provider Type: Voice Service Provider without a STIR/SHAKEN obligation serving end users

We are a reseller of Re-Invent Telecom (RMD0004216) and Core Dial (RMD0002771) and do not have the capability to implement STIR/SHAKEN in our network.

We are exempt from implementation under Rule 35 FCC Rcd 3241, para. 40.

Principal and Ownership Structure:

- A.T.C. Voice Data Inc. is a privately held company based in Atlantic Highlands, NJ.

- Principal, Affiliates, Subsidiaries, Parent Companies:

Michael Doherty

Contact for Robocall Mitigation Issues:

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