

United States of America
FEDERAL TRADE COMMISSION
East Central Region

1111 Superior Avenue, Suite 200
Cleveland, Ohio 44114
(216) 2633455

Jon Miller Steiger
Director

November 27, 2023

CEASE AND DESIST DEMAND

VIA EMAIL TO:
SOP@cscinfo.com

Bandwidth Inc.
David Morken, CEO
2230 Bandmate Way
Raleigh, NC 27607
c/o Corporation Service Company, Registered Agent

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

- x AmazonAccountCompromised
- x AmazonAuthorizeOrderP3
- x AmazonImpers
- x AmazonImpers-P2
- x AmazonPurchaseNotification
- x AmazonSuspiciousCharge
- x AmazonSuspiciousOrderRefund
- x AmazonVariousP1
- x ATT-Impers
- x ChineseISP/Cable/WirelessImpers
- x GovtImpers
- x Grandparentscam
- x LawEnforcementGovtImpersP1
- x LawEnforcementImpers
- x LawEnforcementImpersP2
- x NORCOM-CallCenter
- x NV-MM
- x PayPalImpers
- x

- x SpamCallsSpoofedP2
- x SSA-LawEnforcement
- x T

- x Initiating or causing the initiation of calls that deliver prerecorded messages, unless the person called provided the seller express written permission to call (16 C.F.R. § 310.4(b)(1)(v)); and
- x 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)(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).

Enclosures:

Attachment A (Chart of illegal robocalls)

Attachment B (TSR)

Attachment C (Educare Amended Complaint)

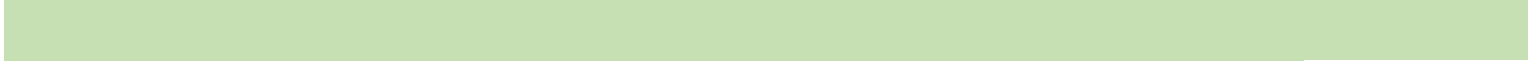
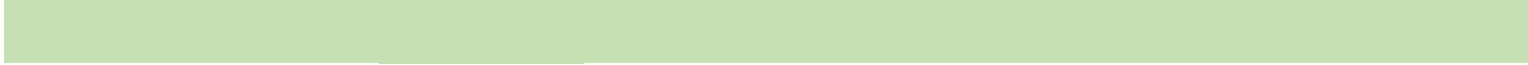
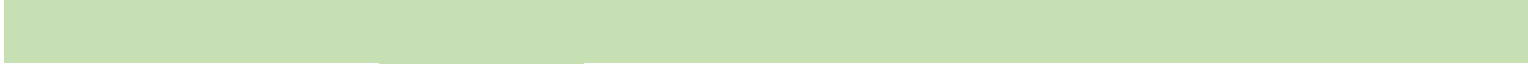
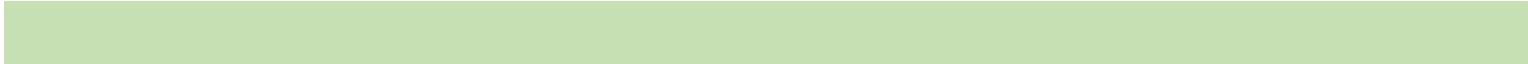
Attachment D (Alcazar Complaint)

ATTACHMENT A

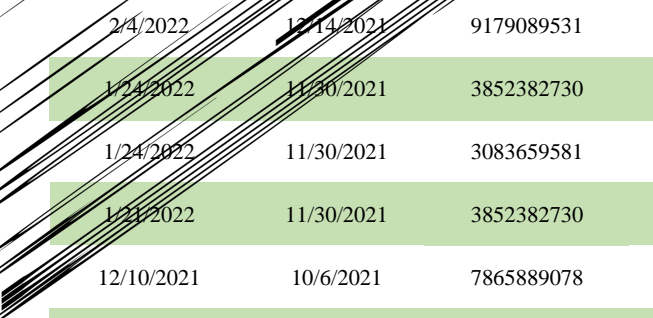
9/12/2022	9/6/2022	2536480206	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
9/12/2022	9/8/2022	2536480206	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
9/12/2022	8/26/2022	6178632898	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
9/12/2022	9/10/2022	7575985544	Utility-30MinDisconnect	



5/5/2022	4/25/2022	8602646919	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
5/5/2022	3/15/2022	2064159860	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
5/4/2022	4/26/2022	8602646919	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
5/4/2022	4/26/2022	8602646919	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
5/4/2022	4/26/2022	6692288500	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
5/4/2022	4/26/2022	6692288500	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
5/4/2022	4/22/2022	8602646919	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
4/29/2022	4/19/2022	7868643110	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)



3/1/2022	2/10/2022	8056786346	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
3/1/2022	2/10/2022	8056786346	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
2/12/2022	2/1/2022	2063338288	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
2/11/2022	2/1/2022	2063338277	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
2/11/2022	2/1/2022	7863103803	Amazon-Impers-P2	16 C.F.R. § 310.4(b)(1)(v)
2/4/2022	12/15/2021	9179089531	Grandparentscam	16 C.F.R. § 310.4(b)(1)(v)
2/4/2022	12/14/2021	9179089531	Grandparentscam	16 C.F.R. § 310.4(b)(1)(v)
2/4/2022	12/14/2021	9179089531	Grandparentscam	16 C.F.R. § 310.4(b)(1)(v)
1/24/2022	11/30/2021	3852382730	Amazon-Impers	16 C.F.R. § 310.4(b)(1)(v)
1/24/2022	11/30/2021	3083659581	Amazon-Impers	16 C.F.R. § 310.4(b)(1)(v)
1/21/2022	11/30/2021	3852382730	Amazon-Impers	16 C.F.R. § 310.4(b)(1)(v)
12/10/2021	10/6/2021	7865889078	ATT-Impers	16 C.F.R. § 310.4(b)(1)(v)
12/10/2021	10/6/2021	7865889078	ATT-Impers	16 C.F.R. § 310.4(b)(1)(v)
12/10/2021	10/6/2021	7865889078	ATT-Impers	16 C.F.R. § 310.4(b)(1)(v)
12/7/2021	10/15/2021	8784442295	ATT-Impers	16 C.F.R. § 310.4(b)(1)(v)
12/7/2021	10/14/2021	083068734452289	Utility-30Min-DTE-Impers	16 C.F.R. § 310.4(b)(1)(v)



10/1/2021	9/21/2021	2063385669	LawEnforcement-Impers-P2		16 C.F.R. § 310.4(b)(1)(v)
9/24/2021	9/22/2021	4159002861	Amazon-SuspiciousCharge		16 C.F.R. § 310.4(b)(1)(v)
7/21/2021	7/16/2021	7474777195	Tech-Support-Fraud		16 C.F.R. § 310.4(b)(1)(v)
7/21/2021	7/16/2021	7474777195	Tech-Support-Fraud		16 C.F.R. § 310.4(b)(1)(v)
7/15/2021	7/9/2021	8045948227	Tech-Support-Fraud		16 C.F.R. § 310.4(b)(1)(v)
7/13/2021	6/30/2021	8388002304	Tech-Support-Fraud		16 C.F.R. § 310.4(b)(1)(v)
6/11/2021	5/19/2021	6153984843	NORCOM-CallCenter		16 C.F.R. § 310.4(b)(1)(v)
6/11/2021	5/7/2021	8542033231	NORCOM-CallCenter		16 C.F.R. § 310.4(b)(1)(v)
6/11/2021	5/6/2021	2069296864	NORCOM-CallCenter		16 C.F.R. § 310.4(b)(1)(v)
6/11/2021	6/1/2021	8644288482	NORCOM-CallCenter		16 C.F.R. § 310.4(b)(1)(v)
5/20/2021	5/3/2021	4697961425	NV-MM		16 C.F.R. § 310.4(b)(1)(v)
4/28/2021	4/15/2021	8608981962	Utility-EversourceCT		16 C.F.R. § 310.4(b)(1)(v)
1/22/2021	1/22/2021	4104246902	Amazon-PurchaseNotification	https://portal.tracebacks.org/api/public/attachments/28719	16 C.F.R. § 310.4(b)(1)(v)