



United States of America
FEDERAL TRADE COMMISSION
East Central Region

1111 Superior Avenue, Suite 200
Cleveland, Ohio 44114
(216) 263-3455

Jon Miller Steiger
Director

November 29, 2023

CEASE AND DESIST DEMAND

VIA EMAIL TO:

stephanie.minnock@lumen.com

CenturyLink Communications, LLC
Kathleen Johnson, CEO
100 CenturyLink Drive
Monroe, LA 71203
c/o Stephanie Minnock, Registered Agent

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

Amazon-AuthorizeOrder
Amazon-AuthorizeOrder-P2
Amazon-AuthorizeOrder-P3
Amazon-Impers-P2
Amazon-SuspiciousCharge
Amazon-SuspiciousCharge-P1
Amazon-Various
AutoWarranty-Extend3
Bank-Impers-P2
CCIRR-Expire
Chinese-Consulate-P2
Computer-Hijack-P1
Debt Reduction-Account Holder Impersonation
Discount-Avail50%
Discount-DirecTV50
Financial-Impers-2
Financial-Impers-7

HBCU-Threat
LegalDept-Action-P1
Legal-Enforcement-Notice
Medicare-AddlBenefits
SpamCalls-DetentionCenter
SSA-KindlyPressOne
SSA-P1-TexasFraud (GovtImpers)
SSA-Suspended
StudentLoan-FederalSuspension
StudentLoan-Forgiveness-P2
TaxReduction-IRSSuspendedCollection
Travel Scam
Utility-30MinDisconnect
Utility-PugetSoundEnergy
Verizon-Impers-P1

More specifically, our investigation revealed that CenturyLink Communications, LLC, apparently routed and transmitted illegal robocalls as set forth in Attachment A.

The Federal Trade Commission (FTC) works closely with USTelecom’s Industry Traceback Group (ITG), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.¹ Between December 30, 2020, and September 11, 2023, ITG investigated 80 prerecorded voice message calls that law enforcement, voice service providers using honeypots (i.e., unassigned numbers held by providers to detect illegal robocalls), and customers of YouMail had flagged as illegal robocalls made without consent of the called party.² ITG conducted tracebacks and determined that CenturyLink Communications, LLC, routed and transmitted the calls. ITG previously notified you of these calls and provided you access to supporting data identifying each call—including a recording and/or a description of the illegal robocall—as indicated in Attachment A. Further, the numerous traceback notices directed to CenturyLink Communications, LLC, indicate that you are apparently routing and transmitting illegal robocall traffic knowingly. **IF YOU ARE ENGAGED IN THESE ACTIVITIES, THEN YOU MUST IMMEDIATELY CEASE AND DESIST FROM ENGAGING IN THEM.**

The FTC, the nation’s consumer protection agency, enforces the Federal Trade Commission Act (FTC Act), 15 U.S.C. § 45 et seq., which prohibits unfat(g)-10 (e)4 (nc)-6 (y,0)3 (a)41 (c)4don

or telemarketer is engaged in any act or practice that violates Sections 310.3(a), (c), or (d), or Section 310.4 of this Rule.” These Sections prohibit, among others, the following conduct:

Making a false or misleading statement to induce any person to pay for goods or services or to induce a charitable contribution (16 C.F.R. § 310.3(a)(4));

Misrepresenting a seller or telemarketer’s affiliation with any government entity (16 C.F.R. § 310.3(a)(2)(vii));

Transmitting false or deceptive caller ID numbers (16 C.F.R. § 310.4(a)(8));

Initiating or causing the initiation of calls that deliver prerecorded messages,⁴ unless the person called provided the seller express written permission to call (16 C.F.R. § 310.4(b)(1)(v)); and

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)(1)(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).

Combating illegal telemarketing is a top priority for the FTC, with a special emphasis on halting illegal robocalls.⁵ We want you to be aware that the FTC has, for example, brought assisting and enforcing 344 (1) 0.95 (1) 0023) 3-0.5J-0.001a) 5.1 (f) (t)-2 v-2 (. E) 5.1 du (n o)r-10 (a) Tc 0.004 Tw [

Within three business days, please send a message to FTC attorney Fil Maria de Banate via electronic mail at fdebanate@ftc.gov, certifying that CenturyLink Communications, LLC, has ceased engaging in the activities described above that may subject it to liability under the TSR or the FTC Act. Please direct any inquiries regarding this letter to Mr. de Banate by email or by telephone at 216.263.3413.

ATTACHMENT A

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]