

State AGs Aim Spotlight on Robocall “Gateway” Service Provider

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Combatting robocalls has been and continues to be an important area of enforcement for State Attorneys General, as we have [previously reported](#). On October 18, 2024, the Anti-Robocall Multistate Litigation Task Force (Task Force), comprised of 51 bipartisan State AGs, released a [notice letter](#) outlining concerns that a Florida-based company was “transmitting suspected illegal robocall traffic on behalf of one or more of its customers” and cautioning that the company “should cease transmitting any illegal traffic immediately.” The letter, which was addressed to iDentidad Advertising Development LLC dba iDentidad Telecom (iDentidad), is illustrative of the collaboration not only among State AGs, but also with federal agencies and private industry, on the issue of robocalls.

In particular, the letter describes how “the Task Force regularly reviews call traffic information provided by several industry sources,” and that based on this data, “it appears that iDentidad is transmitting calls associated with high-volume illegal and/or suspicious robocall campaigns.” These include, for example, “IRS/SSA government imposters, tax relief, financial impersonation, private entity imposters, Chinese-language delivery and impersonations, and utilities disconnect scams, with iDentidad serving as the gateway provider,” as well as several hundred calls to numbers on the National Do Not Call Registry, which caused the Task Force to be “concerned about whether iDentidad is taking any proactive steps to mitigate this traffic.” The letter then suggested that such conduct “could subject iDentidad to damages, civil penalties, injunctions, and other available relief provided to State Attorneys General under both federal and state laws,” including the Telemarketing Sales Rule, Telephone Consumer Protection Act, Truth in Caller ID Act, and “state laws regulating various aspects of the initiation and transmission of illegal robocall and telemarketing call traffic across the U.S. telephone network.”

The letter also highlights the cross-jurisdictional focus of regulators on robocall issues, noting that iDentidad had previously received warnings from both the Federal Trade Commission and Federal Communications Commission about its conduct. And indeed, the same day the Task Force issued its letter, the FCC sent a similar [Notification of Suspected Illegal Robocall Traffic](#) to the company, and separately issued a [Public Notice](#) to “all U.S.-based voice service providers” informing them that they would be permitted to block call traffic from iDentidad’s network if the company failed to take certain remedial measures to mitigate illegal traffic.

The letter to iDentidad is just the latest example of the Task Force focusing attention on companies that either originate or facilitate alleged unlawful call traffic. Earlier this year, the Task Force sent a similar [letter](#) to Texas-based Life Corporation based on its apparent involvement in originating “an

artificially generated robocall campaign sought to dissuade New Hampshire voters from participating in” the state’s presidential primary election. And in 2023, 49 Attorneys General filed a [joint lawsuit](#) against Avid Telecom in Arizona for allegedly facilitating millions of illegal robocalls across the U.S.

Given the broad bipartisan consensus on combating robocalls, State AGs will undoubtedly continue to pursue investigations and enforcement actions against businesses that they perceive to be in violation of the law.