

June 9, 2021

Montreal, QC, Canada

FCC Robocall Mitigation Database declaration

SBK is a non-LEC VoIP provider that has fewer than 100,000 subscribers in the USA and, as per 47 CFR § 64.6304 sub a), is thus exempt from STIR/SHAKEN requirements until June 30, 2022. Nevertheless, our main US carrier has committed to sign our calls to US numbers by the end of June 2021, so we may have partial implementation by the end of the current month.

We are also actively working towards STIR/SHAKEN compliance for Canada in the medium term and will likely have all of our outgoing calls (including Canadian calls to the US) signed with a Canadian certificate at that point. We will update this RMD declaration as the Canadian standard becomes clearer and implementation by our US and Canadian carriers (as well as our own implementation, if permitted) progress.

In the meantime, our robocall mitigation strategy remains, as it has always been:

1. To refuse to service to purely outbound call centers, by enforcing clauses in our standard terms of service that require balance of the inbound/outbound traffic;
2. To technologically limit what CallerID numbers our customers can choose to display on outbound calls to numbers in their inventory, which we validate for ownership prior to adding;
3. To use automated alerting as well as manual spot checks on spikes in outbound calling patterns, to detect and stop fraudulent calls, and;
4. To assist other carriers in investigating any legitimate complaints of robocalling coming from numbers assigned to us, and to suspend the responsible callers if the reported calls actually originate from our network, until the offending calling activity permanently ceases.

Update: As of July 2021, the bulk of our US-to-US calls are being signed by our US outbound carrier.

Sincerely,

François Beaulieu
Chief Technology Officer, SBK Telecom