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February 24, 2024

LightSpar LLC (LightSpar), is a Communications Service Provider for the SME market based in Addison, TX, serving fewer than 100,000 voice subscriber lines. LightSpar is in compliance with a complete STIR/SHAKEN Implementation and certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a),

LightSpar has implemented the following Robocall Mitigation Plan. All voice traffic on the LightSpar network is subject to the following parameters.

Robocall Mitigation Plan

What follows are the specific reasonable steps LightSpar has taken to avoid originating illegal robocall traffic

Overview

The Federal Communications Commission (FCC) has adopted rules requiring voice service providers to implement Stir/Shaken Caller ID authentication technology in their network.

The FCC is requiring all providers to certify in the Robocall Mitigation Database that they have taken the necessary steps to fully implement Stir/Shaken or have developed a Robocall Mitigation plan to ensure that they are not originating illegal robocalls.

The FCC requires that all voice service providers develop a plan that:

- Details the reasonable steps taken to avoid illegal robocalls
- Provide a commitment to cooperate with traceback requests
- Cooperates with investigations focused on stopping illegal robocalls
- File in the Robocall Mitigation Database

The Commission has stated that a mitigation plan is sufficient if the detailed plan can “reasonably be expected to reduce the originating illegal Robocalls”.

Purpose

LightSpar is committed to stopping originating robocalls on our network

Business Operations

LightSpar offers Voice over Internet Protocol (VoIP) service through product channels such as; Hosted, App’s and over traditional broadband. Our customer base is the small – medium size business market.

STIR/SHAKEN Compliance Status

LightSpar operates a Netsapiens VoIP platform integrated with a Stir/Shaken solution by TransNexus.

LightSpar is in compliance with a complete STIR/SHAKEN Implementation. LightSpar certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. The filer also certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2).

Know Your Customer

Accurate identification of a subscriber in the Stir/Shaken platform ties directly to a telephone number and the Caller ID associated with that number. LightSpar defines a subscriber as a customer who has a business relationship with LightSpar in which originating and terminating of calls takes place.

As part of our relationship with that customer, LightSpar requires the following information to verify all new customer:

- Name
- Physical Address
- Federal Tax ID
- Contact Individuals (name/number)
- Type of Business
- Signed Contract

Terms of Service

LightSpar is in the process of including a provision in its Terms of Service which states that voice service customers that are identified as violators of the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act will potentially be subject to enforcement actions by the FCC, appropriate law enforcement, and termination of service

Telephone Number Authorization

LightSpar defines Telephone Number as an originating phone number including call signaling used to identify the caller for call screen purposes. A number used for caller identity may or may not be associated with the subscriber's account.

LightSpar currently obtains numbers from underlying carriers. LightSpar tracks number assignment and monitors these numbers

In those cases where a subscriber wishes to use a number as a caller identity and the number is not managed by LightSpar, then number validation is required. LightSpar will require a Letter of Authorization (LOA) that the customer is the authorized user of that number. LightSpar will check calls originating with this number. Subsequently LightSpar will check the calling party number against our

inventory and will not attest the call unless the calling party number is a number that has been validated.

Monitoring

LightSpar monitors traffic patterns and statistics such as Originating Customer, Terminating Destinations, ASR, ALOC, and short call percentages to ensure the network has not been compromised. Abnormal behavior is escalated to the offending customer and blocked until the customer has rectified issues.

Investigation and Traceback

LightSpar has implemented industry best practices and; cooperates in traceback and trace forward investigations. LightSpar provides timely and dedicated resources when a traceback request is received. To date, LightSpar has not received any traceback request.

LightSpar will investigate suspicious activity and activity reported by third-party identifiers. Investigation could lead to opening a traceback request, contacting a subscriber or blocking if the subscriber does not respond. LightSpar is requiring that all subscribers cooperate with traceback investigation by identifying upstream provider from which the illegal robocall entered our network

LightSpar will respond to all traceback requests in a timely manner. Carriers may contact the NOC at noc@lightspar.com or +1-972-774-0500

Call Blocking

When investigation identifies suspected Robocalling patterns that are suspicious, LightSpar will take necessary action, which could include suspension or terminating the subscriber from the LightSpar network.

LightSpar has capabilities to block calls based on Caller ID, Trunk Group and IP address. Blocking is currently a manual process with ongoing efforts to integrate systems with service providers able to provide automatic blocking.

Plan Updates

This is an evolving response to the Robocall Stir/Shaken requirements. LightSpar will monitor industry best practices and continuously improve our internal processes to ensure this plan and our systems adapt to ever-changing issues. In the event of any material changes to this plan, LightSpar will republish this plan to its employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database.