

RE: Star2Star Communications, LLC's Robocall Mitigation Plan

Pursuant to the requirements of 47 C.F.R. § 64.6305, Star2Star Communications, LLC (the "**Company**") now submits this certification.

1. Company commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. Company further commits to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.¹

2. Other than FCC Order DA 24-1235 made on Dec. 10, 2024 (which notified Company and two of its affiliates to cure their deficient Robocall Mitigation Database filings) at no time in the prior two years has Company (or any entity for which Company shares common ownership, management, directors, or control) been subject of a formal FCC, law enforcement, or regulatory agency action or investigation due to (i) transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls; or (ii) a deficient Robocall Mitigation Database certification or mitigation program and description.²

3. Company requires by contract that all users and resellers of its voice services comply with applicable laws prohibiting illegal robocalling. Further, such contracts allow for blocking and/or termination of services for those that breach such provisions.³

4. Company uses a highly managed sales process to solicit and contract with its customers. Throughout the sales and onboarding process, Company actively corresponds with the customer and the partner who introduced the customer to ensure legitimacy.⁴

5. Company continuously monitors calling patterns in and out of its network to identify fraudulent traffic, including robocalling, traffic pumping, and international toll fraud. If Company determines that a customer is using its services for any illegal activities, including robocalling, Company will suspend or block the services to that customer. Such suspension or blocking may then lead to termination of Company's agreement with the customer.⁵

6. Company will only accept network traffic for termination from third party carriers that are in the Robocall Mitigation Database. Company vets its upstream providers and reviews the Robocall Mitigation Database to determine if they are listed there.⁶

Signature on following page.

¹ See 47 C.F.R. § 64.6305(d)(2)(iii)

² See 47 C.F.R. § 64.6305(d)(2)(iv)

³ See 47 C.F.R. § 64.6305(d)(2)(ii)

⁴ Id.

⁵ Id.

⁶ Id.

Pursuant to 47 C.F.R § 1.16, the undersigned certifies under penalty of perjury that the attestations contained in this document are true and correct.

Star2Star Communications, LLC


BY: Bruce Illes, CLO

Date: 12-17-2024