

Robocall Mitigation Plan



Robocall Mitigation Policy

Date	On behalf of	Version
Feb 18, 2026	Springtel LLC	1.3

Purpose:	Establish and follow a robocall mitigation policy and plan including Do Not Originate (DNO).
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I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they apply best practices to become fully compliant.

The FCC requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database

Springtel LLC submits this robocall mitigation plan as required by the FCC to satisfy the requirements of STIR/SHAKEN and part §64.6301. Springtel LLC has implemented a fully compliant STIR/SHAKEN solution on its networks. Springtel LLC is committed to participating and working within the industry to stop illegal robocalls from originating on networks owned and/or operated by Springtel LLC.

Springtel LLC is a small Internet Telephony Service Provider (ITSP) providing unified communications services. The below outline covers the reasonable and appropriate steps we are taking as part of our robocall mitigation plan. Springtel LLC is dedicated to adhering to and implementing the industry best practices.

II. TOS and Policy Against Robocalls

Springtel LLC end user services are subject to restrictions contained in its published legal notices and all executed services orders and contracts include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call.
- violating any applicable local, state, or federal law using Springtel LLC networks or services in relation to fraudulent activities.

In addition, Springtel LLC is updating its TOS to reference illegal robocalling and all current subscribers will receive notice of the publication of its updated TOS.

Springtel LLC end users are notified that action may be taken up to suspension or termination of service for violation of the TOS and illegal robocalls.

III. Realtime CDR and SIP analytics

Springtel LLC continues to utilize and maintain software that allows for real-time monitoring of inbound/outbound call traffic, including SIP packets, and will alert to suspicious or abnormal patterns of use. Through this platform, we can detect large bursts of calls in a short timeframe through dynamic traffic analysis; identify patterns of low average call duration and/or low completion rates through CDR analytics; identify large numbers of calls from invalid numbers; review common caller ID name (CNAM) values across service providers; and detect calls from numbers that are invalid, unallocated, unassigned or listed on Do Not Originate (DNO) registries.

IV. Customer Relationship

Springtel LLC customer base is comprised of commercial business customers only. A professional business relationship is maintained with each customer along with knowledge of their typical organization and usage of Springtel LLC services. Springtel LLC does not automate (self-service) any portion of the establishment, sale, provisioning, and authorization of service procured on our network which would lead to the ability of the end user to immediately commence robocalling. In addition, our provisioned services to end users include limits and restrictions built in that provide an upper limit to the normal and customary usage of said end user or tenant. These include, but are not limited to:

- Daily spending limits and call limits per tenant and per end user provide an upper ceiling to stop out of control robocalling.
- Large volume outbound calling and/or call campaigns that would breach above are requested and approved ahead of time.

V. Response, Traceback and Resolution

Springtel LLC will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Springtel LLC will dedicate sufficient resources to provide prompt and complete responses to traceback requests upon request.

VI. Know your Upstream Provider

Springtel LLC uses industry standard and FCC compliant upstream provider(s). Springtel LLC conducts, maintains and annually reviews upstream provider relationships for, but not limited to, compliance with any applicable local, state, federal law and/or FCC published notices and mandates.

VII. Compliance with Do-Not-Originate (DNO) Blocking Requirements (47 CFR § 64.1200(o))

- **Overview of Mandate:** Pursuant to the FCC's Eighth Report and Order (FCC 25-15, adopted February 27, 2025), effective December 15, 2025, Springtel LLC implements blocking of calls purporting to originate from numbers on a reasonable Do-Not-Originate (DNO) list across our network, as required for all voice service providers in the call path.
- **Implementation Details:**
 - **Primary solution/provider:** TransNexus (via ClearIP platform for real-time DNO detection, reporting, and blocking).
 - **DNO List Used:** A combination of internal and external lists are used in accordance with ClearIP's Inbound and Outbound Realtime DNO Shield policies.
 - **Maintenance:** The DNO list is dynamically updated hourly, and any new updates are put into action immediately blocking calls that match numbers on the list.
- **Additional Mitigations:** Complements existing STIR/SHAKEN implementation, analytics-based blocking (with SIP 603+ notification per FCC rules), and other robocall prevention measures.
- **Monitoring & Reporting:** We monitor DNO-related blocks and adjust as needed to maintain compliance and minimize false positives.

VIII. Annual Recertification of STIR/SHAKEN Implementation and Robocall Mitigation Program (Effective for March 1, 2026 Deadline)

- **Overview:** Pursuant to the Robocall Mitigation Database Report and Order (FCC 24-135) and Public Notice DA 26-72 (Jan. 22, 2026), Springtel LLC will complete annual recertification of its RMD filing by March 1, 2026, including reaffirmation of STIR/SHAKEN caller ID authentication implementation per 47 CFR § 64.6305(h) and related rules.
- **STIR/SHAKEN Certification Details:**
 - **Current Status:** Complete STIR/SHAKEN Implementation" on IP network portions; registered with STIR/SHAKEN Policy Administrator; own SPC token obtained; certificates generated and used for authentication via TransNexus ClearIP integration.
 - **Scope:** Termination roles; complements DNO blocking and other mitigations.
 - **Updates:** Reviewed for alignment with 2025 Eighth Report and Order modifications; no material changes since last filing to report.
 - **Actions:** Review/update RMD form via FCC portal; certify accuracy; leverage TransNexus reporting for attestation evidence.
- **Ongoing Compliance:** Monitor for changes requiring updates within 10 business days; participate in traceback/governance as needed.