

STIR/SHAKEN Implementation & Robocall Mitigation Plan (RMP)

Provider	Penny Tone Telecom LLC
Implementation Status	Partial STIR/SHAKEN Implementation (Option 2)
Effective Date	February 23, 2026
Traceback Contact Email	david@pennytone.com

1. Status of Caller ID Authentication

Penny Tone Telecom LLC implements STIR/SHAKEN authentication on the portions of its network where technically feasible. Outbound calls routed through the company's primary signing infrastructure are authenticated using certificates issued under Penny Tone Telecom's SPC token. Signing functions are performed by an authorized signing platform acting on behalf of Penny Tone Telecom.

Under certain failover or alternate routing scenarios intended to preserve service continuity, calls may originate without STIR/SHAKEN authentication. All traffic not authenticated under STIR/SHAKEN is subject to the robocall mitigation procedures described in this plan.

2. Role in the Call Chain

Penny Tone Telecom LLC is an originating voice service provider for its own end customers and does not operate as a gateway provider for foreign-originated traffic or as a wholesale transit provider for other voice service providers.

3. Customer Identity Verification and Telephone Number Authorization

Penny Tone Telecom originates traffic only for known and vetted customers. Customers may present caller identification numbers only if the number is directly assigned by Penny Tone Telecom or if the customer provides valid documentation demonstrating authorization to use the number. Third-party telephone numbers are validated and authorized prior to use.

4. Prohibited Traffic Controls

Penny Tone Telecom maintains policies and technical controls intended to prevent the origination of calls using invalid, unallocated, or otherwise prohibited caller identification numbers. Where identified, Penny Tone Telecom may block calls associated with clearly invalid caller ID information or numbers listed as Do-Not-Originate (DNO), and prohibits customers from using the service in connection with unlawful or fraudulent calling practices.

5. Outbound Traffic Monitoring and Investigation

Penny Tone Telecom maintains access to outbound Call Detail Records (CDRs) and conducts a documented monthly review of outbound traffic metrics by customer account, including call volume trends, average call duration (ACD), short duration call percentages, and deviations from historical patterns. Outbound traffic is evaluated for anomalous increases in volume or abnormal call duration behavior consistent with potential robocall activity.

If anomalous traffic patterns are identified, Penny Tone Telecom conducts an investigation which may include customer inquiry, temporary restriction, immediate suspension pending investigation, or termination of service. Investigations and actions taken are documented internally.

6. Traceback Compliance and Cooperation

Penny Tone Telecom responds fully and promptly to all traceback requests from the Federal Communications Commission, law enforcement agencies, state attorneys general, and the Industry Traceback Group. Penny Tone Telecom commits to responding to traceback requests within twenty-four (24) hours.

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7. Upstream Carrier Awareness

Penny Tone Telecom maintains reasonable procedures to verify that its upstream interconnecting carriers are listed in the FCC Robocall Mitigation Database and cooperates with upstream carriers as needed to investigate suspicious activity.

8. Filing Accuracy and Updates

Penny Tone Telecom maintains procedures to ensure the accuracy of its Robocall Mitigation Database filing and will update material changes to contact or certification information within ten (10) business days where applicable.