

CellTrust Corporation may qualify as a voice service provider or system integrator, but if so, is one without a STIR/SHAKEN implementation obligation. Since CellTrust lacks control over the network infrastructure necessary to implement STIR/SHAKEN and only offers voice capabilities through the carrier network or public switch telephony ancillary to our primary capture services via a direct relationship with Service Provider vendors (who are actually offering any such available voice capabilities to our customers' representatives, the indirect user agents), we appear to align exactly with the VASP exception described within the FCC final rule and ATIS-1000088, leading to our understanding that we are exempt from the STIR/SHAKEN implementation obligation.

However, CellTrust has completed implementation of measures to assist with the verification requirements of the STIR/SHAKEN caller ID authentication framework pursuant to 47 CFR § 64.6301(a), because within our system:

- (1) The caller identification information for all SIP calls that exclusively transit our network are authenticated and verified caller identification information; and
- (2) Our system authenticates caller identification information for all SIP calls it originates and that it will exchange with another voice service provider or intermediate provider and, to the extent technically feasible, transmits that call with authenticated caller identification information to the next voice service provider or intermediate provider in the call path; and
- (3) Through our voice service providers, we verify caller identification information for all SIP calls received from another voice service provider or intermediate provider which it will terminate and for which the caller identification information has been authenticated.

While only a part of the implementation is performed by CellTrust, through the combination of CellTrust's implementation of measures to verify users and the full implementation of STIR/SHAKEN by our Service Provider vendors, calls originating through CellTrust's offerings have complete STIR/SHAKEN implementation through collaboration with vendors to prevent illegal robocall traffic.

CellTrust takes reasonable steps to avoid originating illegal robocall traffic and is committed to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, that are directed to [legal@celltrust.com](mailto:legal@celltrust.com), and to cooperate with such entities in investigating and stopping any illegal robocallers that use CellTrust's service to originate calls.

CellTrust complies with obligations to know our customers by requiring an onboarding process that includes the execution of a service agreement and registration of the users that will have access to CellTrust's voice services and requires users to login with unique credentials. CellTrust knows its upstream providers by engaging only with Tier 1 service providers who have entered into service agreements with CellTrust and are subject to due diligence and security obligations, and CellTrust honors the blocking of traffic by its upstream providers in compliance with § 64.1200(n)(3).

At no time in the prior two years, has CellTrust been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise

facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.