

Robocall Mitigation Program

Rev. Date: February 2026

I. Background and Regulatory Authority

Under the authority granted to the Federal Communications Commission (“FCC”) pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and 47 CFR § 64.6300 et seq., Procesamos LLC operates as a Voice Service Provider and maintains a documented robocall mitigation program designed to prevent the origination and transmission of illegal robocalls on its network.

Procesamos LLC maintains full compliance with FCC Robocall Mitigation Database (RMD) certification requirements.

II. STIR/SHAKEN Implementation

Procesamos LLC has fully implemented STIR/SHAKEN caller ID authentication across the IP portions of its network.

- Authentication signing is performed at the Session Border Controller (SBC) prior to call routing.
- Procesamos LLC signs calls using its own SPC Token issued by the STI-PA (Iconectiv).
- STI-CA utilized: Peeringhub.
- Attestation levels (A, B, C) are applied in accordance with verified customer relationships and validated telephone number authorization.
- Procesamos LLC does not claim any extension, exemption, or delayed implementation status.

Where traffic cannot be authenticated (e.g., interconnection limitations outside company control), enhanced monitoring and verification controls apply.

III. Role in Call Chain

Procesamos LLC operates solely as a Voice Service Provider.

- OCN: 331K
- The company does not operate as a Gateway Provider.
- Procesamos LLC does not originate traffic for unidentified wholesale carriers.
- All outbound traffic originates from verified enterprise customers.

Outbound traffic on the network is human initiated via softphone systems. The company does not provision predictive dialers, automated campaign platforms, or bulk robocall systems.



IV. Governance and Compliance Oversight

Procesamos LLC maintains internal compliance oversight for robocall mitigation controls.

A designated compliance officer is responsible for:

- Oversight of STIR/SHAKEN implementation
- Monitoring procedures
- Customer vetting approval
- Traceback response coordination
- Record retention compliance

Mitigation procedures are reviewed periodically and updated as regulatory requirements evolve.

V. Know Your Customer (KYC) Standards

Procesamos LLC conducts documented customer verification prior to service activation.

Required documentation includes:

- Legal business name
- Physical business address (no PO Boxes)
- EIN confirmation
- Authorized representative government-issued identification
- Description of business use case
- Expected call volume and traffic profile
- Telephone number authorization documentation

Where appropriate, additional risk screening may include sanctions screening and adverse media review.

Customers are provisioned only after compliance review approval. Traffic models inconsistent with declared use cases are not activated.

All onboarding documentation is retained for no less than twenty-four (24) months following service termination.

VI. Telephone Number Authorization

Procesamos LLC verifies customer authorization to use telephone numbers presented as caller ID.

- Numbers assigned by Procesamos LLC are documented internally.
- Externally provided numbers require written authorization and validation prior to provisioning.
- Attestation levels are assigned consistent with documented authorization.

Unauthorized or unverifiable numbers are not provisioned.

VII. Traffic Monitoring and Analytics Controls

Procesamos LLC employs structured and scalable traffic monitoring controls appropriate to its network size and traffic characteristics.

Monitoring includes:

- Review of Call Detail Records (CDRs)
- Session logging at the Session Border Controller (SBC)
- Evaluation of call duration patterns
- Review of call volume consistency relative to declared customer use case

Due to the company's modest traffic volume and enterprise-only customer base, traffic monitoring is conducted through periodic compliance review of CDR data and session logs. If traffic patterns appear inconsistent with the customer's declared use case, further review is initiated.

VIII. Mitigation Procedures for Suspicious Traffic

If anomalous or suspicious traffic patterns are detected:

- Immediate internal compliance review is initiated.
- Customer is contacted for clarification.
- Traffic may be temporarily rate-limited or suspended pending investigation.
- Confirmed unlawful activity results in termination of service.
- Associated telephone numbers may be blocked from further origination.
- Relevant documentation is preserved for potential traceback cooperation.

Mitigation actions are documented and retained for audit purposes.

IX. Record Retention

Procesamos LLC retains the following records for no less than twenty-four (24) months:

- Call Detail Records (CDRs)
- STIR/SHAKEN authentication logs
- Customer onboarding documentation
- Number authorization records
- Traceback response documentation
- Internal mitigation investigation records

Procesamos LLC maintains routine data backup procedures to preserve the integrity and availability of retained records. Operational data is subject to regular backup schedules designed to prevent data loss and ensure availability for regulatory or traceback inquiries.

Backups and records are maintained in secure storage environments with restricted access.



X. Traceback Cooperation

Procesamos LLC cooperates fully and in good faith with traceback requests from the Industry Traceback Group (ITG) or any successor entity designated by the FCC.

Initial responses are provided within twenty-four (24) hours of receipt.

Supporting documentation is preserved and furnished as required.

XI. Scalability and Ongoing Compliance

Procesamos LLC maintains mitigation controls proportionate to its limited-scale enterprise model.

As network footprint, customer base, or traffic characteristics evolve, monitoring and mitigation controls will be expanded accordingly to maintain compliance with FCC regulations.

XII. Contact Information

For questions regarding this document, please contact:

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