

We are a small company focusing on multitenant PBX software development. We sell our software to our clients or host it as a service. We have very small volume of calls. We send/receive calls via our underline service provider's network. Our service provider has completed the STIR/SHAKEN implementation. Our service provider signs and authenticates all of our calls on their servers. I was told we were not required to implement the STIR/SHAKEN on our server at that time. However, I called them few days ago. It seems there are some changes. Please advise if we are required to have the Stir/Shaken implementation on our servers. We'd like to meet FCC Stir/Shaken requirements if we are required to.

We have worked on the Stir/Shaken requirements since 2021. Our implementation delays are mainly due to our small calling volume and the big costs in the development.

Even we do not have STIR/SHAKEN implementation, I can certify that we are able to trace back all of the calls in our network. This is because:

- We purchased all those phone numbers from our underline service provider and assigned them to only those on-file employees.
- We enforce the outbound calls to use only those assigned/legitimate phone numbers as caller IDs.
- No auto dialer is allowed. Every call is placed by a real person with manual dialing for business use.
- We have small calling volume, and we keep all of the Call Detail Records for many years
- We send/receive all of our calls to/from only one underline carrier.