

Robocall Mitigation Plan for Centratel Services International, Inc.

SkySwitch & Coredial Reseller – VoIP Service Provider

1. Company Information

- Company Name: Centratel Services International, Inc.
- FRN: 0025402249
- Business Address: 11193 Seminole Blvd Largo FL 33778
- Contact Name & Title: Laura Downen, President
- Phone: 727-319-0671
- Email: ldownen@centratel.net

2. Certification Statement

Centratel Services International, Inc. certifies that it has implemented a robocall mitigation program in accordance with FCC rules (47 CFR § 64.6305) to prevent the origination of illegal robocalls, and is actively working to comply with all applicable STIR/SHAKEN and mitigation obligations as a SkySwitch & Coredial reseller.

3. Robocall Mitigation Program Details

a. Relationship with SkySwitch & Coredial and Network Responsibility

As a white-label VoIP service provider using the SkySwitch & Coredial platforms, we do not maintain our own switching infrastructure. SkySwitch & Coredial are responsible for STIR/SHAKEN implementation at the upstream carrier level. However, as the reseller and customer-facing entity, we maintain full responsibility for managing and vetting our end users, enforcing service terms, and monitoring for potential robocall abuse.

b. Know-Your-Customer (KYC) Practices

We follow strict onboarding procedures to vet all new customers, including:

- Verification of business identity and purpose (EIN, ID, business licenses).
- Requiring and reviewing customer agreements that prohibit illegal robocall activity.
- Rejecting high-risk applicants or use cases that indicate potential abuse (e.g., short-duration high-volume call patterns, call centers, lead-gen dialing without consent).

c. Call Traffic Monitoring and Abuse Detection

We use SkySwitch & Coredial's call reporting tools to:

- Monitor call metrics such as ASR, ACD, call volume, and call patterns.
- Identify anomalies or patterns indicative of robocall behavior.
- Investigate any traffic flagged by SkySwitch or Coredial, or traceback groups.

d. Enforcement Actions

If suspicious or illegal activity is detected, we will:

- Immediately investigate the customer's call records and usage.
- Suspend or terminate service as warranted by the findings.
- Notify SkySwitch or Coredial and cooperate with traceback and enforcement processes.

e. STIR/SHAKEN Compliance

As a SkySwitch & Coredial reseller:

- STIR/SHAKEN is implemented at the upstream carrier level (SkySwitch & Coredial and their carrier partners).
- We ensure our end users' Caller ID data is accurate and not spoofed.
- We rely on SkySwitch & Coredial's SHAKEN implementation to apply authentication to outbound traffic.

f. Traceback Cooperation

We promptly (within 24 hours) respond to traceback requests from the Industry Traceback Group (ITG), SkySwitch, or law enforcement by:

- Providing necessary customer information in compliance with legal requirements.
- Assisting in investigations and mitigating further illegal traffic.

g. Customer Education and Policy Enforcement

- We educate customers during onboarding on legal calling practices, including TCPA and FCC rules.
- All customers must sign an agreement that prohibits autodialing, spoofing, or robocalls without prior consent.
- Repeat violators or abusive customers are permanently banned from the platform.

h. Internal Staff Training

Our support and compliance teams are trained to:

- Recognize red flags in usage patterns.
- Handle traceback requests.
- Enforce anti-robocall policies effectively.

4. Contact for Traceback and Compliance

- Name: Laura Downen
- Title: President
- Phone: 727-319-0671
- Email: ldownen@centratel.net
- Availability: M-F 9 am to 5 pm Eastern

5. Certification and Filing

This Robocall Mitigation Plan has been submitted to the FCC's Robocall Mitigation Database as required under 47 CFR § 64.6305. We continue to review and update this plan in response to regulatory or operational changes.