

Revised Robocall Mitigation Database (RMD) Plan
11-24-2025

Company: All Services Are Provided LLC

FCC Filing: Robocall Mitigation Database

1. Company Information

Company Name: All Services Are Provided LLC

Business Type: VoIP Reseller

FCC Registration Number: 0031421266

Company Address: 9700 Mackenzie Rd, Suite 200

Contact Name: Patrick Laughlin

Contact Phone: 314-492-7300

Contact Email: plaughlin@asapbts.com

All Services Are Provided LLC is a VoIP reseller offering retail VoIP services to small businesses and retail customers. The company and its customers do not generate high-volume calls or robocall traffic and are dedicated to preventing the origination, transit, or termination of illegal robocalls on its network.

2. Robocall Mitigation Program

Although All Services Are Provided LLC relies on its upstream carriers' STIR/SHAKEN call authentication, it has implemented its own internal robocall mitigation program to prevent the origination of illegal or fraudulent robocalls.

a. Customer Vetting Customer (KYC) verification

To prevent or reduce illegal robocalls through its voice services, All Services Are Provided LLC follows best practices for verifying the identity of all its voice service subscribers. The subscriber verification process is designed to confirm the legitimacy of each customer and establish a service relationship. Typically, the company verifies customer identities by collecting:

- Physical location
- Contact person(s)
- Federal tax ID
- Nature of the customer's business

All customers undergo Know Your Customer (KYC) verification before activating new accounts, including:

- Business registration validation (EIN, Business License)
- Identity verification (government-issued ID for authorized representatives)
- Call use-case verification (e.g., contact centers, enterprise communications)
- Customers suspected of engaging in unlawful robocalling are rejected or terminated

b. Traffic Monitoring

All Services Are Provided LLC has implemented a standard process to monitor the usage and quality of its network facilities. It performs regular reviews of call detail records (CDRs) to quickly identify unusual or suspicious calling activity. If the system detects activity consistent with illegal robocalls, the customer will be contacted within twenty-four hours for further investigation.

Continuous monitoring of call patterns includes:

- High-volume short-duration traffic
- Calls to known Do-Not-Call (DNC) list numbers
- Suspicious spikes in call origination
- Automated alerts trigger a review when abnormal traffic patterns are detected

c. Telephone Number Validation Practice

All Services Are Provided LLC has a validation process to ensure that customers can only use a telephone number in connection with their subscribed voice service(s). Call spoofing is not allowed in our system.

d. Traceback Cooperation

- All Services Are Provided LLC has the procedure in place to fully cooperate with the ITG in all traceback requests.
- Will provide call detail records (CDRs) and account information as required by the FCC within the mandated timeframe.

e. Customer Enforcement

To prevent new and renewing customers from originating illegal calls, All Services Are Provided LLC utilizes service agreements and acceptable use policies. These documents

include terms indicating that services should not be used for making illegal robocalls. The company reserves the authority to suspend or terminate a subscriber's voice service for violations.

Contractual prohibitions against unlawful robocalling include:

- Customer notification and remediation request
- Temporary call blocking or suspension of services
- Permanent termination for repeated or egregious violations

3. Certification of STIR/SHAKEN Implementation

All Services Are Provided LLC acts as a VoIP reseller and does not directly originate or terminate calls on the PSTN. Instead,

The filer is exempt from STIR/SHAKEN implementation obligations pursuant to the FCC's Eighth Report and Order on Call Authentication (released November 22, 2024), which clarifies that only voice service providers (VSPs) with control over the SIP signaling and network infrastructure necessary to sign calls are subject to STIR/SHAKEN compliance requirements.

As a reseller of Flowtoute & Bandwidth.com, the filer does not originate calls directly and does not control the network infrastructure required to implement STIR/SHAKEN. Therefore, the filer is not obligated to obtain an SPC token or sign calls using its own certificate. Instead, the upstream provider is responsible for authenticating calls and assigning attestation levels in accordance with FCC rules.

This exemption is supported by the FCC's clarification that VSPs lacking technical control over call authentication remain exempt from both STIR/SHAKEN and the Third-Party Rule requirements. The filer will submit a robocall mitigation plan and comply with all applicable obligations for non-STIR/SHAKEN providers.