

Blue Star Services LLC

FRN 0031423122

Robocall Mitigation Plan

The following policies apply to all customers of Blue Star Services LLC and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic and ensure compliance with FCC rules.

KYC Customer Identity & Business Verification (Pre-Onboarding)

- Collect government issued photo ID for individuals or articles of organization plus EIN/Tax ID.
- Verify beneficial ownership (25% or more control) using a BOI form.
- Screen owners and control persons.
- Confirm physical business address, business phone and website.
- Confirm nature of the business.

Third Party Analytics/In-House Analytics

- We use vendor Hiya for spam/fraud-label and number lookups.
- We internally monitor rapid DID rotation.

STIR/SHAKEN & Call Authentication Attestation Policy

- We implement STIR/SHAKEN through our upstream service provider Skyetel, which is registered and authorized to issue and use STIR/SHAKEN certificates. All SIP calls originated on the network are authenticated and signed via Skyetel according to attestation levels A, B or C based on customer vetting and number assignment.

Traffic Monitoring

- We monitor call traffic patterns for anomalies and investigate any reports of suspicious activity.
- We act immediately and contact our customer for a detailed explanation and corrective action, if applicable.

Compliance Statement: We certify that the above mitigation practices are actively implemented, and we acknowledge the changes that the FCC is making and will comply accordingly . We have known our customer for 20 years. They are American manufacturers and medical offices. None of them are engaged in any phone marketing or robocalls.