



CenterComs LLC

Robocall Mitigation Database (RMD) and STIR/SHAKEN Policy

Policy: P001 Revision 3

08/27/2025

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Policy P001 – Revision 3

Effective Date: August 27, 2025

1. Purpose

This policy documents CenterComs LLC's compliance with the Federal Communications Commission's (FCC) STIR/SHAKEN framework and Robocall Mitigation Database (RMD) requirements under 47 CFR §64.6301 and §64.6305. It ensures that CenterComs maintains effective caller ID authentication and implements robocall mitigation practices in alignment with the FCC's Eighth Report and Order.

2. Company Overview

- **Business:** CenterComs LLC is a small VoIP provider serving only verified, known customers.
- **PBX Platform:** Private Branch Exchange (PBX), used solely for call routing and customer extensions.
- **Service Provider:** Bandwidth, which provides SIP trunking, routing, and STIR/SHAKEN authentication using CenterComs' Telonium-issued certificate.
- **Certificate Authority:** Telonium, issuing SHAKEN certificates renewed annually via ACME pipeline.

3. STIR/SHAKEN Implementation

- **Certificates:** Issued by Telonium, hosted and applied by Bandwidth.
- **Attestation:** Bandwidth assigns and applies appropriate attestation levels (A, B, or C) based on customer verification and number assignment.
- **Signing:** All outbound SIP calls are signed by Bandwidth with CenterComs' certificate.
- **Verification:** Inbound calls are verified by Bandwidth; attestation data is passed to PBX.
- **PBX Role:** Secure SIP (TLS) connectivity with Bandwidth. PBX handles call routing but does not perform STIR/SHAKEN directly.

4. Robocall Mitigation Database (RMD) Compliance

- **Registration:** CenterComs is registered in the FCC's RMD as an originating service provider with Complete STIR/SHAKEN Implementation. OCN and FCC Filer ID are maintained.
- **Robocall Mitigation Program:**
 - **Customer Vetting:** Know Your Customer (KYC) process with identity and number assignment verification.
 - **Traffic Monitoring:** Usage and anomaly monitoring on PBX and Bandwidth reports (threshold: flagged at sustained >500 calls/hr per extension or unusual international call spikes).
 - **Mitigation:** Illegal traffic blocked, accounts suspended/terminated as necessary.
 - **Traceback Cooperation:** Commitment to respond fully and within 24 hours to all traceback requests from the FCC (Commission), law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
 - **Customer Education:** Customers informed of obligations and encouraged to report suspicious activity.

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5. Compliance Checklist

CFR Requirement	CenterComs Action	Compliance Status
§64.6305 – Maintain RMD filing	CenterComs maintains current RMD filing	Full
§64.6305 – KYC Program	All customers vetted with verified IDs and number assignments	Full
§64.6305 – Monitor Traffic	Monitor PBX/usage reports; anomalies flagged >500 calls/hr per extension	Full
§64.6305 – Mitigation	Block, suspend, or terminate accounts; respond to traceback	Full
§64.6301 – Caller ID Authentication	Outbound SIP calls signed by Bandwidth with CenterComs' certificate	Full
§64.6301 – Caller ID Verification	Inbound STIR/SHAKEN verified by Bandwidth, passed to PBX	Full

6. Responsibilities

- **CenterComs LLC:** Maintains verified customer records, ensures RMD registration is current, and coordinates with Bandwidth.
- **Bandwidth:** Hosts CenterComs' certificate, signs outbound calls, verifies inbound calls, and assigns attestation levels.
- **Telonium:** Issues and renews STIR/SHAKEN certificates via ACME pipeline.

7. Contact Information

CenterComs LLC

Email: info@centercoms.com

Phone: 713.540.0030

RMD Filing Contact: Keith Oliver

8. Policy Review

This policy will be reviewed annually or upon significant regulatory changes. Review will include an update to monitoring thresholds, RMD filings, and compliance tables.

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