

FCC

Re: TRACED and STIR/SHAKEN compliance

FRN: 0031439847

To whom it may concern:

According to 47 CFR § 64.6304 we are classified as a "Small Voice Service Provider" since we have less than 100,000 subscribers that use our service. Our current subscriber count is somewhere around 160. We are therefore exempt from STIR/SHAKEN compliance as defined in 47 CFR § 64.6301 until June 30th, 2023. We are monitoring the deployment of STIR/SHAKEN in order to determine the best method to integrate with it.

Our robocall mitigation strategy is to have all our subscribers register the Caller IDs that they will be using for their business. This registration process includes us verifying that the Caller ID is authorized for use by that client as well as making sure that the number works for call backs. This allows us to prevent our subscribers from placing spoofed or anonymous calls. The Caller ID registration is persistent and remains on the subscribers account even after the account is closed. This allows us to provide any contact information for the parties responsible for placing the calls through our telephony service.

 9/27/21
James Pearson, Director