



SMS Telecomm LLC
Robocall Mitigation Plan 2025

1. Introduction

SMS Telecomm LLC is a U.S.-registered wholesale VoIP service provider. The company is committed to preventing the origination, transmission, or termination of unlawful and fraudulent robocall traffic on its network. This Robocall Mitigation Plan is submitted in compliance with 47 CFR § 64.6305 and the Federal Communications Commission's requirements for inclusion in the Robocall Mitigation Database (RMD).

SMS Telecomm LLC does not originate voice traffic and does not assign telephone numbers. As a result, SMS Telecomm LLC does not directly generate or sign calls using STIR/SHAKEN credentials. STIR/SHAKEN signing is performed by upstream originating providers prior to traffic being delivered to SMS Telecomm LLC. SMS Telecomm LLC only accepts traffic from upstream partners that are STIR/SHAKEN compliant and provide properly authenticated and signed calls. Any traffic that is not properly authenticated is blocked or filtered in accordance with this Robocall Mitigation Plan.

2. Customer Vetting and Onboarding

To prevent the introduction of unlawful or unwanted robocall traffic, SMS Telecomm LLC follows strict Know Your Customer (KYC) procedures before onboarding any customer:

- All new customers undergo identity verification, including review of corporate registration documents, government-issued identification of authorized representatives, and proof of legitimate business operations.
- Customers are required to execute a Service Agreement that explicitly prohibits the use of SMS Telecomm LLC's network for illegal robocalls, fraud, spam, or other unlawful activity.
- During onboarding, SMS Telecomm LLC reviews expected traffic profiles, including anticipated call volumes, destinations, and use cases.
- Customers with unverifiable identities, unclear business purposes, or suspicious practices are denied service.

3. Traffic Monitoring and Call Analytics

SMS Telecomm LLC actively monitors network traffic on its own switching platform to detect and mitigate suspicious or unlawful robocall activity:

- Real-time traffic monitoring is used to identify abnormal calling patterns, including unusually high call-per-second rates, very short-duration calls, and calls to invalid or high-risk destinations.
- Automated alerts are generated when anomalous or suspicious traffic patterns are detected.
- Traffic that fails authentication or appears suspicious is blocked immediately pending investigation.

- Customers identified as repeated violators are suspended or permanently disconnected and blacklisted.

SMS Telecomm LLC does not use any third-party robocall analytics or monitoring vendors. All traffic monitoring, analysis, and mitigation controls are performed internally on SMS Telecomm LLC's network switching infrastructure.

4. Upstream Provider Verification

Because SMS Telecomm LLC relies on upstream partners for call origination and termination, the company ensures that only compliant providers are interconnected:

- All traffic carried by SMS Telecomm LLC must include a valid STIR/SHAKEN signature provided by upstream partners.
- SMS Telecomm LLC does not interconnect with providers that cannot demonstrate compliance with FCC robocall mitigation requirements or that are not listed in the Robocall Mitigation Database, where applicable.
- Periodic reviews and audits of upstream partners are conducted to ensure continued compliance with applicable FCC rules.

5. Traceback Cooperation

SMS Telecomm LLC fully cooperates with the FCC and the Industry Traceback Group (ITG) in the investigation of suspected unlawful robocall traffic:

- SMS Telecomm LLC maintains a designated robocall mitigation and compliance contact to respond to traceback and regulatory inquiries.
- Traceback requests are acknowledged and responded to within 24 hours, including the provision of relevant call records and customer information, as required by law.
- SMS Telecomm LLC cooperates with lawful requests from regulatory and law-enforcement authorities in accordance with applicable regulations.

6. STIR/SHAKEN Implementation Status

SMS Telecomm LLC does not directly sign calls using its own STIR/SHAKEN certificate because it does not originate calls or assign telephone numbers. Instead, SMS Telecomm LLC relies exclusively on upstream originating providers to sign and authenticate calls before they are delivered to its network.

SMS Telecomm LLC enforces a strict policy under which unsigned or improperly authenticated calls are not permitted to pass through its systems. This ensures that all traffic carried by SMS Telecomm LLC is subject to STIR/SHAKEN authentication prior to transmission.

7. Ongoing Compliance and Updates

SMS Telecomm LLC is committed to ongoing compliance with FCC robocall mitigation requirements:

- This Robocall Mitigation Plan is reviewed and updated at least annually, or sooner if FCC rules or guidance change.
- Employees responsible for customer onboarding, traffic management, and network operations receive compliance training related to robocall mitigation obligations.
- SMS Telecomm LLC applies commercially reasonable, risk-based robocall mitigation practices and continues to enhance monitoring tools and KYC procedures as new threats and industry best practices evolve.

8. Certification

SMS Telecomm LLC certifies that this Robocall Mitigation Plan is accurate and that the company is committed to full compliance with FCC robocall mitigation requirements and ongoing cooperation with regulatory and industry enforcement efforts.