



Robocall Mitigation

Circuit ID is exempt from the STIR/SHAKEN implementation requirement as it qualifies as a Small Voice Service Provider under the plain language definition outlined in Section 64.6304(a)(2) of the Commission's rules (47 C.F.R. § 64.6304(a)(2)). As a non-facilities-based service provider, Circuit ID does not have direct control over the network infrastructure required for STIR/SHAKEN implementation. Instead, it relies on its underlying carriers for interconnection with upstream providers and the use of their analytics systems to block illegal traffic that may originate from those upstream providers.

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