

Robocall Mitigation Plan & Explanation Letter

To the FCC Robocall Mitigation Database Team,

JE Technology LLC is submitting our revised Robocall Mitigation Plan and updated certification to be reinstated in the database.

About the notices: We honestly never got the emails the FCC sent out. The first time we even heard about this was when our upstream provider, Sangoma, reached out and told us that our status in the RMD needed to be fixed. As soon as we learned about the issue, we got to work on updating everything. We've now also fixed our contact email in the RMD so any future messages will definitely reach us, and we'll be checking it regularly.

About the missed February 26, 2024 deadline: We didn't update at the time because we didn't know the new requirements applied to us as a reseller. We rely fully on Sangoma for SIP trunking and Bicom Systems for our hosted VoIP platform. They handle the actual STIR/SHAKEN work. We thought that covered it, but now that it's clear we also need our own mitigation plan on file, we've written one and are including it here. We take this seriously and will make sure to stay on top of filings and FCC notices from now on.

Sincerely,
Jackie Erani
Owner, JE Technology LLC

Robocall Mitigation Program Description

JE Technology LLC provides hosted VoIP services to end-user customers utilizing upstream partners Sangoma (SIP trunking) and Bicom Systems (hosted PBX platform). JE Technology does not own or operate any facilities-based switching or routing infrastructure and does not directly originate calls onto the public switched telephone network (PSTN). Instead, all call origination, routing, and STIR/SHAKEN implementation obligations are fulfilled by its upstream carriers.

Pursuant to 47 CFR § 64.6304, only facilities-based voice service providers that directly originate calls on their own IP networks are obligated to implement STIR/SHAKEN. Because JE Technology relies entirely on upstream providers for SIP connectivity and call origination, it is exempt from direct STIR/SHAKEN implementation requirements.

Although exempt, JE Technology maintains a robocall mitigation program designed to prevent unlawful robocalling activity on its platform. This includes:

- Onboarding only verified and legitimate business customers.
- Monitoring customer call traffic patterns to detect potential illegal robocall activity.
- Cooperating with traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours.
- Immediately suspending or terminating accounts engaged in unlawful robocalling or spoofing.

Know Your Customer (KYC) Measures

JE Technology LLC serves a small customer base and verifies each customer at onboarding. We:

- Collect and confirm business registration and contact details.
- Require customers to attest that services will not be used for illegal robocalling.
- Monitor traffic patterns for suspicious activity, with immediate suspension or termination for violations.

Expanded KYC and Mitigation Procedures (Updated to Meet FCC Requirements)

1. Enhanced KYC for New Customers

Before activating any new customer, JE Technology performs identity verification including:

- Secretary of State business registration checks
- EIN/Tax ID verification
- Verification of business address and ownership
- Website and online presence validation
- Required description of intended calling use cases
- Confirmation of consent-gathering processes and opt-out procedures

2. KYC for Existing Customers

JE Technology applies identical KYC standards to all existing customers. We periodically:

- Update business information
- Reconfirm call-use cases
- Review customer consent documentation when applicable

3. Use of Analytics

JE Technology uses upstream carrier analytics from Sangoma and Bicom Systems to detect:

- Short-duration, high-volume call spikes
- Abnormal call failure ratios
- Irregular ANI or destination patterns
- Traceback or consumer complaint indicators

4. Mitigation Steps

Upon detection of suspicious traffic, JE Technology:

1. Reviews call detail records
2. Contacts the customer for explanation and documentation
3. Applies mitigation actions such as:
 - Rate limiting
 - Blocking specific destinations
 - Campaign suspension
 - Permanent termination if required
4. Immediately blocks traffic identified as illegal by the FCC or ITG

5. Cooperation with Enforcement

JE Technology fully cooperates with traceback requests and FCC inquiries within required response timeframes.

6. Recordkeeping

KYC records, traffic analyses, and mitigation actions are retained as required under FCC rules.



Jackie Erani
Owner, JE Technology LLC
Date: [11/17/2025](#)
