



Solutions

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Dear FCC RMD Team,

Central Point Networks, LLC (FRN 0028771285, RMD0008474) has updated its Robocall Mitigation Database filing to address the deficiencies identified in the FCC Enforcement Bureau's notification dated November 21, 2025 (Case No. EB-TCD-25-000385901).

The following updates have been made to our RMD certification:

1. Enforcement History: Provided comprehensive description of prior FCC Enforcement Bureau action, including case number, dates, and current compliance status.
2. Robocall Mitigation Plan: Enhanced KYC procedures to explicitly describe affirmative, effective measures preventing customers from originating illegal robocalls, including business verification, service use screening, acceptable use policy enforcement, account provisioning controls, ongoing monitoring procedures, and graduated enforcement actions.

The updated certification has been filed in the RMD portal as of 03-25-2026.

We appreciate the opportunity to cure these deficiencies and remain committed to robocall mitigation.

Respectfully,

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Central Point Networks, LLC - Robocall Mitigation Plan

STIR/SHAKEN Implementation

Central Point Networks, LLC is a small voice service provider based in Bakersfield, CA. We provide voice services to business customers through our upstream carrier, Skyetel. We do not have our own SPC token. Skyetel handles all STIR/SHAKEN call authentication and signing on our behalf across the IP portion of our network.

Robocall Mitigation Program

We take the following steps to prevent illegal robocalls from being originated through our service:

1. **Customer screening:** We verify the identity and business purpose of all new customers before provisioning service. Customers must agree to our Acceptable Use Policy (included in our Master Services Agreement and Service Guide), which prohibits illegal robocalling, caller ID spoofing, and any violation of the TCPA or Truth in Caller ID Act.
2. **Account controls:** Customer accounts are provisioned with concurrent call limits and calls-per-second restrictions appropriate to their business size and use case.
3. **Ongoing monitoring:** We monitor customer call patterns for unusual activity, including unexpected spikes in volume, high short-duration call ratios, and calling patterns inconsistent with the customer's stated business purpose. We investigate all anomalies.
4. **Enforcement:** If we determine a customer is originating illegal robocalls or spoofing caller ID, we suspend and terminate their service immediately.
5. **Traceback response:** We commit to responding fully within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group, and to cooperating in investigating and stopping illegal robocallers using our service. This commitment is also included in our Master Services Agreement.

We do not use third-party call analytics vendors. We rely on Skyetel's network-level fraud detection and our own manual monitoring of customer accounts.

Upstream Provider

Skyetel - Miami, FL - <https://www.skyetel.com>

Skyetel provides STIR/SHAKEN authentication across their entire network and maintains their own RMD filing.

Know Your Customer - Existing Customers

Our KYC procedures apply to both new and existing customers. We periodically review active accounts to confirm continued legitimate use. Any complaint, traceback request, or report of suspicious activity from any source triggers an immediate investigation of the customer's account and calling records.