

Phone GS (France)

Robocall Mitigation Program

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Primary Address:

Phone GS (France)
41 Avenue du 8 Mai 1945
95200 Sarcelles, France
Tel: +33 (0)1 76 42 00 00
Website: <https://phone.gs/home>
Email: contact@phone.gs



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I. Robocall Mitigation Program Introduction

Pursuant to the applicable orders and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following is the Robocall Mitigation Program (“RMP”) that details the procedures of Phone GS (France) (“Phone GS”), to prevent unlawful robocalls from originating, terminating, or being carried or processed where it is operating as a Foreign Voice Service Provider. Unless defined differently herein, capitalized terms used herein have the same definitions as set forth under 47 C.F.R § 64.6300.¹

A. Company Summary

Phone GS offers VOIP Centrex phone services & software solutions for medium and large companies that are simple to use, trusted and customizable. Phone GS only serves as a Foreign Voice Service Provider for this RMP. Phone GS does not have an Operating Company Number (“OCN”).

B. Filing of RMP and Implementation of STIR/SHAKEN

Pursuant to 47 C.F.R. § 64.6305(d)(1)(iii) and (d)(2)(i), Phone GS has not implemented the STIR/SHAKEN authentication framework on any portion of its network because it is a Foreign Voice Service Provider.

Pursuant to 47 C.F.R. § 64.6305(d)(2)(ii) and (iii), Phone GS’ RMP, which has been uploaded into the RMD, reflects the “reasonable steps to avoid originating illegal robocall traffic” and includes “a commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.”

Pursuant to 47 C.F.R. § 64.6305(d)(4)(vi)(C), Phone GS’s role in the call chain includes being:

- A Voice Service Provider without a STIR/SHAKEN implementation obligation

¹ Within this RMP, Phone GS has implemented rules established under the FCC’s *Sixth Report and Order* along with its *Seventh Report and Order*. See *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, *Seventh Report in Order* in CG Docket 17-59 and WC Docket 17-97 *et al.*, [FCC 23-37](#), at Appendix A (rel. May 19, 2023) (“*Seventh Report and Order*”); *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, WC Doc. No. 17-97, *Six Report in Order and Notice of Proposed Rulemaking*, [FCC 23-18](#), at Appendix A (rel. Mar. 19, 2023) (“*Sixth Report and Order*”).



serving end-users.

II. Robocall Mitigation Program

This RMP applies to Phone GS's VoIP services and provides information on the specific reasonable steps Phone GS has taken to avoid originating, terminating, or carrying or processing illegal robocall traffic:

- (1) Implementing Knowing Your Customer
- (2) Requiring Contractual Provisions to Mitigate Illegal Robocalls
- (3) Validating Customer's Right to Use Telephone Numbers
- (4) Analyzing and Monitoring Network Traffic Routing Through Phone GS's Network
- (5) Investigating Suspicious Calling Patterns
- (6) Ensuring Foreign Providers Are Not Using Phone GS to Carry or Process High-Volume Illegal Traffic onto the U.S. Network
- (7) Responding to Commission, Law Enforcement and ITG Traceback Requests within 24 Hours
- (8) Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues
- (9) Updating Phone GS's RMD Submission and RMP
- (10) Training Employees

1. Implementing Knowing Your Customer

The FCC requires that a Voice Service Provider's RMP "describe with particularity" its robocall mitigation techniques as follows: (1) a Voice Service Provider must describe how it is meeting its existing obligation to take affirmative, effective measures to "know its customers" and prevent new and renewing customers from originating illegal calls; and (2) Voice Service Provider must describe any "know-your-upstream provider" procedures in place designed to mitigate illegal robocalls.² To comply with the requirements to describe their "new and renewing customer" and "know-your-upstream provider" procedures, such providers must describe any contractual provisions with end-users or upstream providers designed to mitigate illegal robocalls.³ Phone GS's contractual provisions with its customers are described in Section 2 below.

² See 47 C.F.R. § 64.6305(d)(2)(ii); see also *Sixth Report and Order*, FCC 23-18, ¶ 40; *Seventh Report and Order*, FCC 23-37, ¶¶ 3 & 49.

³ See *Sixth Report and Order*, ¶ 40 and n.154 (explaining that "[w]e do not expect providers to necessarily submit contractual provisions, but to describe them in general terms, including whether such provisions are typically included in their contracts."); *Seventh Report and Order*, FCC 23-37, ¶¶ 3 & 49 (explaining that "[i]n general, we



Phone GS has implemented Know Your Customer procedures used when onboarding new or renewing customers to ensure that such customers and providers do not or are not likely to engage in any prohibited conduct. When signing up new end user customers that will receive its VoIP services, Phone GS appropriately collects information about a subscriber to determine that subscriber's "identity and operational legitimacy."⁴ For instance, as part of the vetting process, Phone GS generally requires its customers to provide the full legal name of the company, state or country of incorporation, the physical address of its operations, the billing name and address (when different), and the customer contact name and telephone number, nature of the customer's business, among other things. Doing so is necessary to provide a prompt response to traceback requests and enforcement efforts.

With these measures along with those discussed in Section 3, below, Phone GS takes "affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic."⁵

expect voice service providers will need to exercise due diligence before accepting traffic from an upstream provider, and may want to collect information such as "obtaining the [voice service provider's] physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the [voice service provider's] business. We do not find that collecting this information is either uniformly necessary or sufficient, and voice service providers may need to take additional steps, such as adopting contract terms that allow for termination and acting on those terms in the event that the upstream provider attempts to use the network to carry or process a high volume of illegal traffic." While the Commission "do[es] not expect perfection," "all voice service providers must take effective steps, and if a voice service provider carries or transmits a high volume of illegal traffic that primarily originates from one or more specific upstream providers, the steps that provider has taken are not effective and must be modified for that provider to be in compliance with our rules.").

⁴ *Wireline Competition Bureau Issues Caller ID Authentication Best Practices*, WC Docket Nos. 17-97 and 20-324, DA 20-1526, Public Notice, ¶ 12 & n.35 (rel. Dec. 22, 2020) ("FCC's Caller ID Authentication Best Practices"), *available at* <https://docs.fcc.gov/public/attachments/DA-20-1526A1.pdf>.

⁵ 47 C.F.R. § 64.1200(n)(4). As for the FCC's know your upstream providers, 47 C.F.R. § 64.6305(d)(2)(ii), Phone GS notes that given the nature of its traffic to the U.S., it has no upstream providers.



2. Requiring Contractual Provisions to Mitigate Illegal Robocalls

In satisfaction of the FCC's requirements that a provider "know its customers" ⁶ procedures, below are descriptions of Phone GS' contractual provisions with end-users that are designed to mitigate illegal robocalls.

Phone GS's voice service customers are subject to its [Terms of Sales](#), which includes provisions that prohibit (a) the use of its telephone service by telecommunications professionals: operators, phone shops, telemarketing, phoning, call center, prepaid cards, voice services; (b) the interrupted use of its telephone service, in particular through automatic dialing and continuous dialing on the line; (c) the sharing of its telephone access with people outside the home of the subscriber; (d) free or expensive use of the its telephone service as a gateway for redirection of communications; and (e) the use of it telephone service in a manner that is devoid of any reasonable character. The Terms of Sales specify that violation of these general conditions "will result in an immediately termination of the PhoneGS line."

3. Validating Customer's Right to Use Telephone Numbers

When Phone GS establishes service to a retail end user voice customer, Phone GS confirms the end user customer has a verified association with the telephone numbers it uses for its originating telephone calls. In this connection, Phone GS either assigns the telephone numbers to its VoIP end user customers or ports an existing end user's customer telephone number Phone GS's VoIP service.

4. Analyzing and Monitoring Network Traffic Routing Through Phone GS's Network

If Phone GS observes a high-volume voice traffic on its network, it will analyze such traffic to identify and monitor patterns consistent with robocalls. For example, Phone GS may employ tools to detect and act on such patterns. Phone GS does not use a third-party analytics vendor.

As discussed in Section 5, below, if suspicious calling patterns are found, Phone GS, after further investigation, takes appropriate action to address such behaviors. If the calls are determined to be illegal robocalls originating on Phone GS's network, Phone GS's service to the end user customer originating such calls will be terminated. See Section 2, above. If the robocalls are illegal and terminating on Phone GS's network, Phone GS will work with its Intermediate provider to address and possibly block such

⁶ 64.6305(d)(2)(ii) (which cites the obligation under 47 C.F.R. § 64.1200(n) to "[t]ake affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.").



traffic.

5. Investigating Suspicious Calling Patterns

If Phone GS detects a pattern consistent with or specific to illegal robocalls, or if it otherwise has good reason to suspect illegal robocalling or illegal spoofing is taking place over its network, Phone GS will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action. Such actions Phone GS takes may include, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's name, trademark, or d/b/a name; reviewing complaints; suspending or terminating the party's ability to originate, route, or terminate calls on its network; and notifying law enforcement authorities. Phone GS recognizes that foreign originating traffic that uses +1 USA Caller-ID values requires special scrutiny.

Notably, if calls are determined to be illegal robocalls originating on Phone GS's network, its service to its end user customer will be terminated in accordance with Phone GS's Terms of Sales discussed in Section 2, above. If the robocalls are illegal and terminating on Phone GS's network, Phone GS will work with its Intermediate Provider to address and block such traffic. To ensure that Phone GS's end users and its network are protected from illegal and potentially fraudulent call traffic, and consistent with contractual limitations and legal considerations, Phone GS takes these appropriate steps to combat such traffic being originated, terminated, or carried or processed on its network.

6. Ensuring Foreign Providers Are Not Using Phone GS to Carry or Process High-Volume Illegal Traffic onto the U.S. Network

Pursuant to 47 C.F.R. § 64.1200(n)(5), Phone GS takes reasonable and effective steps discussed under Sections 1-6, above, to ensure that "any originating provider or intermediate provider, foreign or domestic, from which it directly receives traffic is not using the provider to carry or process a high volume of illegal traffic onto the U.S. network."

7. Responding to Commission, Law Enforcement and ITG Traceback Requests

Phone GS has been and is committed to fully and timely responding to all such traceback requests from the Commission, law enforcement, and the industry traceback consortium/group ("ITG"), and will continue to cooperate with such entities in investigating and stopping illegal robocallers that use Phone GS's services and ensure its network is not utilized for the origination, termination or routing of unwanted and illegal robocalls. In accordance with the FCC's regulations 47 C.F.R. § 64.1200(n)(1) along with



47 C.F.R. § 64.6305(a)(2) and (d)(2)(iii), Phone GS will respond to all traceback requests from the Commission, law enforcement, and the ITG well within 24 hours⁷ and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use Phone GS's network and/or services to originate calls. Phone GS will take the steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission through its Enforcement Bureau and will comply with the requirements of such notice and do so in accordance with the applicable FCC rules.⁸

8. Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

To further ensure Phone GS's network is not utilized for the origination, termination, or carrying or processing of unwanted and illegal robocalls, Phone GS provides the following name, title, department, business address, telephone number, and email address of the individual within Phone GS that handles robocall mitigation-related issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Contact Name:	Yohann Maarek
Contact Title:	President
Contact Department:	Main Office
Contact Street Address:	41 Avenue du 8 Mai 1945
Contact City:	95200 Sarcelles,
Contact Country:	France
Contact Telephone Number:	+33 (0)1 76 42 00 00
Contact Email:	contact@phone.gs

9. Updates to Phone GS's RMD Submission and RMP

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(d)(5), Phone GS will update its submission in the RMD within 10 business days of any change to the applicable information it must provide and update in the RMD.

⁷ This is 24-hour window applies within business days, per rule 47 C.F.R. § 64.1200(n)(1)(ii) and as clarified by the Commission. See *a/so* FCC 22-37, at n.211.

⁸ See 47 C.F.R. § 64.1200(n)(2) and (3).



10. Employee Training

Finally, it is Phone GS's policy that employees responsible for combating robocalling are educated on Phone GS's RMP along with any related implementing procedures and stay appropriately apprised of the latest developments and emerging trends to combat illegal robocalling. Phone GS treats this continuing education as a critical piece of its role in the telecommunications ecosystem and its strategic position as a partner in mitigating illegal traffic.

11. Description of FCC Action

On February 22, 2024, the FCC's Enforcement Bureau ("Bureau") issued an order that removed Phone GS, along with 11 other providers (collectively, "Companies") from the FCC's Robocall Mitigation Database ("RMD"). See Phone GS et al., EB-TCD-23-00035606, Order, [DA 24-152](#) (E.B. rel. Feb. 22, 2024) ("Removal Order"). The Removal Order was effective upon its release and stated that Phone GS's (among the other Companies the Removal Order was directed at) RMD certification was "deficient because the attachment submitted with each Certification fails to include a description of any robocall mitigation efforts being taken by the Companies." The Removal Order further stated that "[t]he Wireline Competition Bureau ("WCB") notified the Companies of these deficiencies, which they did not cure. The Bureau then ordered the Companies to cure the deficiencies in their Certifications or explain why their Certifications should not be removed from the Database, and the Companies did neither." DA 24-152, ¶ 7.

By way of background, prior to the Removal Order, on October 16, 2023, the Bureau issued Show Cause Orders that directed "the Companies to correct the deficiencies in their Certifications or explain why their Certifications should not be removed from the Database. The Companies had 14 days to file responses with the Bureau either informing the Bureau that the deficiency had been corrected or explaining why their Certifications should not be removed from the Database. The Bureau did not receive any responses from the Companies, and none of the Companies made any amendments to their Certifications." See DA 24-152, ¶ 6. For a copy of the Phone GS's Show Cause Order, see [DA 23-972](#).⁹

Phone GS has addressed the issues that caused it to be included in the Removal Order (and the Bureau's October 16, 2023 Show Cause Order to Phone GS) and sought approval of the WCB and Bureau to re-file this cured RMD certification and attached RMP.

⁹ Prior to issuing this Show Cause Order, the WCB contacted Phone GS "on February 18, 2022, to inform it that its robocall mitigation program attachment contained with its certification may have been uploaded in error because it did not satisfy the Commission's rules requiring it to describe its robocall mitigation efforts." [DA 23-972](#), ¶ 7. The WCB's "notice asked Phone GS to upload a revised attachment that complied with the Commission's rules"; however, the WCB "did not receive a response from Phone GS acknowledging or addressing this notice, and Phone GS did not correct the identified deficiencies in its certification." *Id.*