

Robocall Mitigation Plan – Litecom L.L.C.

Litecom L.L.C. provides hosted and premises-based phone system solutions to business and organizational end-users. Litecom fully controls these systems and connected VoIP Trunk Services. Trunk services provided exclusively through a Upstream VoIP Carrier which is a certified upstream carrier listed in the Robocall Mitigation Database, which has fully implemented STIR/SHAKEN across its network.

Because all outbound traffic is originated and authenticated by this carrier, Litecom does not have a direct STIR/SHAKEN implementation obligation. Nonetheless, we maintain a robust robocall mitigation program as required by 47 CFR § 64.6305(a), which includes:

1. Customer Vetting (KYC) – In order to know our customers, Litecom does not use a third-party sign-up process or automated process to on-board potential clients. Clients can only be manually added to our system for services. We have employees to respond to tickets directly, including following up with phone conversations to verify who we are speaking with. We also visit the potential customer's site to do evaluations on their services, which also allows us to verify that it is a legitimate business. We only provide services to legitimate businesses and organizations. All new customers undergo a verification process to confirm legitimacy prior to activation.
2. Traffic Monitoring – We monitor customer traffic patterns for abnormal or suspicious behavior. Any evidence of unlawful robocall activity results in immediate investigation.
3. Enforcement Actions – We reserve the right to suspend or terminate service for any customer found to be originating unlawful robocalls.
4. Upstream Compliance – All calls traverse this Carrier, which is fully compliant with STIR/SHAKEN and handles authentication for traffic.

5. Traceback Cooperation – We commit to fully cooperating with traceback requests from the Commission, law enforcement, and the Industry Traceback Group, and will respond to such requests within 24 hours.
6. Ongoing Compliance – Our compliance department maintains a schedule of FCC filing deadlines and reviews our policies regularly to ensure alignment with Commission rules and industry best practices.

Through these measures, Litecom L.L.C. ensures our services cannot be used to originate unlawful robocalls, while maintaining reliance on our upstream provider's full STIR/SHAKEN implementation.

Litecom L.L.C. does not offer unmanaged VoIP services and only offers services installed, managed and controlled completely by Litecom L.L.C. staff.