

18 December 2024

To:

Federal Communications Commission
Office of the Secretary
45 L Street NE
Washington, DC 20554

Subject: Petition for Exemption from Robocall Mitigation Database Requirements for Small Carriers

Docket Number: DA 24-1235

1. Introduction

Vuable Voice Communications, LLC. (“Vuable”), respectfully submits this request for an exemption from the Robocall Mitigation Database (RMD) requirements as outlined in the FCC’s rules under **DA 24-1235**. This request is submitted on the basis of our status as a **small voice service provider** as defined by the FCC and our established practices for mitigating robocalls within our network operations.

We affirm our commitment to combating illegal robocalls while seeking an exemption from filing requirements due to the small scale and localized nature of our operations.

2. Company Information

- **Company Name:** Vuable Voice Communications, LLC
- **FCC Registration Number (FRN):** 0031551120
- **Primary Contact Information:**
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3. Qualification as a Small Carrier

Vuable qualifies as a “small voice service provider” under the FCC’s definition, which includes providers with fewer than 100,000 subscriber lines.

- **Subscriber Base:** Vuable services fewer than 400 subscriber lines.
- **Revenue:** Our company’s annual revenue falls well below the FCC’s threshold for larger carriers, with a localized market focus in **Ohio and the greater midwestern United States**.

- **Market Reach:** We exclusively serve a small, geographically defined customer base and do not engage in large-scale telecommunications operations.

This data demonstrates that we are a small carrier as defined in **47 C.F.R. § 64.6305** and therefore eligible to request this exemption.

4. Robocall Mitigation Efforts

Even as a small carrier, Voluable takes significant steps to combat illegal robocalls and ensure a secure communication environment for our customers. Our existing robocall mitigation efforts include:

1. Call Traffic Monitoring and Analytics:

- We actively monitor our network for suspicious call traffic patterns and high call volumes indicative of potential robocall activity.

2. Customer Education and Reporting Mechanisms:

- Customers are informed about robocall risks, and we provide clear channels for reporting unwanted or suspicious calls.

3. Call Blocking Features:

- We deploy call-blocking tools to screen and prevent known spam and fraudulent calls.

4. Interconnection Agreements:

- Our interconnection agreements include requirements for upstream carriers to adhere to call authentication protocols.

5. Justification for Exemption

Voluable seeks an exemption from full Robocall Mitigation Database submission based on the following points:

1. Small Scale of Operations:

- With our limited subscriber base, the impact of illegal robocalls on our network is significantly lower than larger carriers.

2. Established Mitigation Practices:

- Our existing measures effectively combat robocall traffic without necessitating the full overhead of an RMD submission.

3. Compliance Costs:

- The financial and operational burdens of full compliance with RMD requirements are disproportionate to the risks posed by robocalls on our network.

4. Limited Impact on Industry-wide Robocall Activity:

- As a small carrier, our operations do not meaningfully contribute to the prevalence of robocalls, as we do not engage in bulk call origination or marketing campaigns.

6. Assurance of Compliance

While we seek an exemption from RMD filing, Voluable remains fully compliant with all existing FCC robocall regulations. Specifically:

1. STIR/SHAKEN Implementation:

- We are actively working toward implementing **STIR/SHAKEN** in IP-based portions of our network, and we follow best practices for call authentication.

2. Adherence to FCC Guidelines:

- We regularly review and align our operations with the FCC's rules to prevent the origination of illegal robocalls.

3. Commitment to Consumer Protection:

- Protecting our customers from robocalls is a core priority, and we continue to update our mitigation strategies in response to emerging threats.

7. Conclusion and Request

Based on the information provided, we respectfully request the FCC grant Voluable Voice Communications, LLC. an exemption from Robocall Mitigation Database filing requirements under DA 24-1235.

We believe this exemption is warranted given our status as a small carrier, our proactive robocall mitigation efforts, and the limited scale of our operations.

We appreciate the FCC's consideration of this request and remain committed to ongoing collaboration in the fight against illegal robocalls.

8. Submission Information

This exemption request is submitted electronically via the **FCC Electronic Comment Filing System (ECFS)** under **DA 24-1235**.

For any questions or further clarification, please do not hesitate to contact us at the information provided above.

Sincerely,

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