

Robocall Mitigation Program Description

Clear Converse Corporation

FRN 0031571904

1. Company Overview

Clear Converse Corporation is a United States based voice service provider that delivers VoIP and SMS messaging services directly to end users. The company does not provide wholesale trunking services and does not operate as an intermediate provider. Clear Converse maintains a controlled customer base of approximately one hundred business clients, which allows for direct oversight of all accounts and calling activity.

2. STIR SHAKEN Implementation Status

Clear Converse acknowledges its obligation under 47 CFR section 64 point 6301 subsection a to implement the STIR SHAKEN caller authentication framework. Clear Converse has begun the implementation process and is completing the remaining requirements including OCN assignment, STI PA approval, SPC token issuance, certificate acquisition, and platform integration.

Clear Converse originates one hundred percent of its outbound voice traffic through QuestBlue. QuestBlue applies STIR SHAKEN signing to outbound calls that transit its network. Clear Converse also receives approximately thirty percent of its inbound traffic through Bandwidth, which applies STIR SHAKEN signing to authenticated calls delivered through its network. As a result, a portion of Clear Converse traffic already receives STIR SHAKEN authentication through these underlying carriers.

Full implementation of STIR SHAKEN on Clear Converse facilities is not yet complete, but the company continues to make measurable progress toward full deployment. Until implementation is complete Clear Converse operates under a robocall mitigation program consistent with 47 CFR section 64 point 6305 subsection a and takes all reasonable steps to prevent the origination of illegal robocall traffic.

3. Robocall Mitigation Practices

a. Know Your Customer Procedures

Clear Converse conducts a thorough Know Your Customer review for every customer before activating service. Procedures include the following.

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- Verification of customer identity including legal name, physical address, and government issued identification for individuals.
- Verification of business customers through Secretary of State records, EIN confirmation, corporate formation documents, and public business listings.
- Review of the customer use case for outbound calling including expected call volumes, call patterns, destinations, and caller identification.
- Confirmation that each customer has a legitimate relationship to the numbers or caller names they request to use.
- Clear Converse accepts only verified business customers and does not permit anonymous or unverifiable signups.

b. Credential Security and Access Control

- Clear Converse does not provide SIP credentials directly to end users.
- All devices must be remotely provisioned by Clear Converse staff or by automated secure provisioning systems.
- Devices that cannot be provisioned securely are considered incompatible and are not permitted on the Clear Converse network.
- This approach prevents the exposure or resale of credentials that could allow unlawful callers or other actors to place illegal traffic.

c. Traffic Monitoring and Analytics

Clear Converse continuously monitors call activity across its network. Internal tools and analytics provided by underlying carriers are used to identify unusual or suspicious call patterns. Monitoring includes the following.

- Call volume thresholds and spikes that do not match a customer historical usage
- High short duration call percentages
- Call patterns indicative of potential unlawful or spoofed traffic
- Concentration toward specific destinations or high cost routes
- Complaint reports or traceback referrals

Clear Converse performs all analytics and traffic monitoring internally and through analytics capabilities provided by its underlying carriers. Clear Converse does not currently use a dedicated third party analytics vendor. If Clear Converse later engages a specific analytics provider the company will update this robocall mitigation plan to identify that vendor.

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When suspicious traffic is detected the account is promptly reviewed. Clear Converse contacts the customer for explanation and may block traffic, suspend service, or terminate service when necessary.

d. SMS Monitoring

Clear Converse limits SMS traffic to approved business customers only. All messaging is monitored for compliance with CTIA principles and FCC requirements. Throughput controls and content review are applied to identify and prevent unlawful or abusive messaging activity.

e. Traceback Cooperation

Clear Converse fully cooperates with the USTelecom Industry Traceback Group and responds to traceback requests within twenty four hours. Clear Converse also cooperates with law enforcement and Commission staff on investigations involving unlawful or suspicious calling activity.

4. Enforcement History

Clear Converse was subject to enforcement review in August, 2025 due to a deficient Robocall Mitigation Database filing. This revised filing corrects the identified deficiencies and provides a complete and accurate description of Clear Converse robocall mitigation practices and STIR SHAKEN implementation progress.

5. Certification

Clear Converse certifies that it will maintain compliance with FCC robocall mitigation requirements, continue progressing toward full STIR SHAKEN implementation, and update this mitigation plan as needed to reflect any changes to procedures or technical capabilities.

Signed



Daniel Harold

CEO, Clear Converse Corporation

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