



## Robocall Mitigation Program (RMP)

**Company:** Instacall LLC

**FCC FRN:** 0031872278

**FCC Registration:** IPES / VoIP Provider

**Website:** [www.instacall.digital](http://www.instacall.digital)

**Service Scope:** Wholesale & Retail VoIP, DID Origination, Call Center Enablement (USA & Canada)

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### 1. Purpose & Regulatory Commitment

Instacall LLC ("Instacall") is committed to preventing illegal robocalls, spoofing, and fraudulent telecommunications traffic in compliance with:

- FCC TRACED Act
- 47 CFR §64.6305
- STIR/SHAKEN Mandates
- Industry Traceback Group (ITG) requirements

This Robocall Mitigation Program (RMP) outlines the **technical, operational, contractual, and enforcement measures** implemented to detect, prevent, and respond to illegal robocalling activity on Instacall's network.

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### 2. Network Overview

Instacall operates a controlled VoIP environment consisting of:

- SBCs and softswitches (Connex CS / Asterisk-based infrastructure)
- DID origination & termination
- Call center traffic enablement
- SIP trunking for verified business customers

Traffic is accepted **only from onboarded, KYC-verified customers** under strict contractual terms.

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### **3. STIR/SHAKEN Implementation**

#### **3.1 Attestation Policy**

Instacall applies STIR/SHAKEN attestations as follows:

##### **Attestation Condition**

- A**            Verified customer + owned DID
- B**            Verified customer, third-party DID
- C**            Transit / limited verification
  - Certificates issued via approved STI-CA
  - Full Passport signing on outbound calls
  - Verification on inbound calls

#### **3.2 Certificate Security**

- Private keys stored on secured servers
  - Role-based access control (RBAC)
  - Certificate rotation and audit logging
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### **4. Customer Onboarding & KYC Controls**

#### **4.1 Mandatory KYC Requirements**

All customers must provide:

- Government-issued ID (individuals)
- Business registration documents
- Proof of address
- Use-case declaration
- Dialing purpose & target geography

## 4.2 Use-Case Risk Classification

Customers are classified as:

- Low Risk (enterprise PBX, internal calls)
- Medium Risk (sales & support call centers)
- High Risk (lead generation, outbound campaigns)

Higher risk classes receive **enhanced monitoring and stricter limits**.

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## 5. Traffic Monitoring & Analytics

### 5.1 Real-Time Monitoring

Instacall continuously monitors customer traffic with its home Grown AI-Driven tool taking call sample transcription and matching against flagged notions that generates immediate alert and prompt traffic suspensions

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## 6. Call Blocking & Enforcement

Instacall enforces a **zero-tolerance policy** for illegal robocalls.

### 6.1 Immediate Actions

Upon detection or complaint:

- Traffic suspension
- DID quarantine
- Outbound blocking
- Customer investigation notice

### 6.2 Permanent Actions

- Account termination
  - Blacklisting of IPs / DIDs
  - Reporting to upstream carriers
  - ITG cooperation
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## 7. Traceback Cooperation (ITG)

Instacall commits to **full cooperation** with the Industry Traceback Group.

- 24/7 response capability
  - Traceback responses within **24 hours**
  - Preservation of CDRs (minimum 6 months)
  - Identification of originating customer
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## 8. Contractual Safeguards

All customer contracts include:

- Explicit robocall prohibition
  - Consent requirements (TCPA compliant)
  - Right to suspend or terminate immediately
  - Indemnification clauses
  - Cooperation obligations during tracebacks
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## 9. Internal Compliance Governance

### 9.1 Designated Compliance Officer

Instacall has appointed a **Robocall Compliance Officer** responsible for:

- Policy enforcement
- Regulatory updates
- Carrier coordination
- Internal audits

### 9.2 Training & Awareness

- Periodic staff training
- Carrier policy updates
- Incident response drills

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## 10. Recordkeeping & Audits

Instacall maintains:

- Call Detail Records (CDRs)
- STIR/SHAKEN logs
- KYC documentation
- Complaint records
- Enforcement actions

Records are retained for **at least 12 months**, or longer where required.

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## 11. Continuous Improvement

Instacall continuously improves its mitigation program through:

- AI-based call pattern analysis
  - Adaptive call throttling
  - Third-party reputation feeds
  - Carrier feedback loops
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## 12. Certification

Instacall LLC certifies that this Robocall Mitigation Program is:

- Actively enforced
- Technically implemented
- Reviewed periodically
- Made available to the FCC and carriers upon request

**Authorized Signatory:**

A handwritten signature in black ink, appearing to read 'Washed Bari Saikatt' in a cursive, stylized script.

Name: WASHED BARI SAIKATT

Title: FOUNDER

Date: 2/18/2026