

Robocall Mitigation Statement

IP Transfer, LLC is committed to detecting, avoiding, and blocking robo-dialed traffic. We follow industry best practices to enable our efforts. IP Transfer, LLC is an intermediary carrier, providing services to other carriers and providers, and a voice service provider that may originate calls on behalf of its end user customers.

All IP Transfer, LLCs' intermediate traffic is originated by small businesses and carriers on other networks and is transited to IP Transfer, LLC already signed and "Attested". IP Transfer, LLC passes the Token and Attestation level that is sent by the originating carrier. IP Transfer, LLC signs calls on behalf of its end user customers.

IP Transfer, LLC uses a multi-faceted approach in our mitigation strategy. These include:

1. We know our customers' businesses and monitor them closely:
 - a. Enterprise: We verify that the corporate entity and business purpose is legitimate, i.e. each customer is subject to the Company's KYC review process.
 - b. Telecoms: We verify that telephone numbers are being legitimately used.
 - c. Use Case: Verify and educate customers regarding vertical, opt-in, and calling practices.
 - d. Identity: Validate and update CallerID, CNAM, & verified calls.
2. Stir/Shaken
 - a. We have updated our SIP software to allow the Stir and Shaken tokens/messages to be passed from the traffic originators to our traffic termination companies. We have completed the Stir/Shaken testing process and validated that all information is being passed correctly.
 - b. We partner with vendors that already implemented Stir/Shaken in their network.
3. Traceback/USTelecom
 - a. We actively participate in the Traceback community including the FCC, law enforcement and the industry traceback consortium.
 - b. We require all peering customers to be US based, have an active FRN and to be an FCC 499-A filer. .
4. Audit and monitoring
 - a. We constantly monitor traffic statistics and metrics such as CPS, ASR, ACD, failure type (SIP Q.850 codes). We have placed Call Blocking and Traffic auditing software in place to alert and block as much illegal robocalling as possible.
 - b. We take seriously all FCC Complaints. We investigate these diligently and work directly with customers to improve their behavior or remove them from our network if their call patterns do not improve.

At IP Transfer, LLC we take Robo-call mitigation seriously. We believe our current practices put us in line with best in class practices; however we continuously look for ways to improve and stay abreast of new approaches to reduce Robo-calls.

Sincerely,

Joseph Yapsuga

Joseph Yapsuga
President and CEO
IP Transfer, LLC

Filed: July 20, 2026