

SST L.L.C. Robocall

Mitigation Plan

Updated March 29, 2024

Traceback Cooperation

- SST L.L.C will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, Shooting Star Technology Communications Inc will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom's Industry Traceback Group. SST L.L.C. has identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 24 hours, excluding weekends and all major holidays.
- SST L.L.C. will require traceback cooperation. For all new and renegotiated service applications governing the transport of voice calls, our policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Subscriber Vetting Practices

- Residential and small business practices
 - SST LLC will vet residential and small businesses through normal business practices and will obtain billing address, primary residence, or business location.
- Commercial retail end-users
 - SST LLC will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.
 - SST LLC has call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. Shooting Star Technology Communications Inc will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. SST L.L.C. will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.
- Wholesale Customers
 - SST L.L.C. will be responsible for the resale providers who lease voice services from SST L.L.C. has call records and will closely monitor for significant deviations from the typical call volume of the reseller. SST L.L.C. will contact resale provider within 24 hours of such known deviations to determine if call volumes are legitimate. SST L.L.C. will rely on vetting practices of the resale provider, as resale provider is responsible to the end user voice customer. SST L.L.C. will provide wholesale services to Shooting Star Technology Internet Service Provider. Shooting Star Technology Internet Service Provider will lease the loop and switching from SST L.L.C. . Shooting Star Technology Internet Service Provider will provide VoIP services to the end user.

Telephone Number Validation Practices

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use the telephone number is unknown to SST L.L.C. will validate as necessary and appropriate.

International Practices

- SST L.L.C. will continue to monitor best practices and implement as needed.

Ongoing Mitigation Practices

- SST L.L.C. will investigate suspicious calls and calling patterns. If SST L.L.C. detects a pattern consistent with illegal robocalls, or if SST L.L.C. otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, SST L.L.C. will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying law enforcement authorities.

SST L.L.C. originated Inter-Carrier TDM traffic uses third-party services that uses analytics, reporting and alerts to identify suspected illegal robocalls from originating on our network. We will investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we take corrective action immediately. Examples of analytics typically used to identify illegal robocalls as part of third-party services are as follows.

- Invalid Calling Number format
- Calling Numbers within number blocks that have not been assigned by the Number Pooling Administrator for use by any carrier
- Unassigned area codes
- High risk calling numbers
- Reputation lookups

SST L.L.C. also works with Bandwidth LLC (our intermediate access tandem provider).

SST L.L.C. contact information:

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