



Robocall Mitigation Program – Subseven, LLC

FRN: 0030947212

Certification: Option 3 – No STIR/SHAKEN Implementation (In Progress)

Effective Date: June 20, 2025

Mitigation Program Overview

Subseven, LLC is a registered interconnected VoIP provider serving SMB clients with voice services via hosted and on-premise PBXs. At this time, we are in the process of implementing STIR/SHAKEN authentication using our own SPC token and certificate, in combination with a hosted signing service (Anveo Direct). We expect full implementation to be complete by July 31, 2025, and will amend this certification at that time.

In the interim, we operate a robocall mitigation program in accordance with 47 C.F.R. § 64.6305(a). The following procedures are in place:

Traceback Cooperation

We fully cooperate with the Industry Traceback Group, the FCC, and law enforcement agencies. We respond to traceback requests within 24 hours of receipt, and maintain logs of all such requests and responses.

Call Monitoring and Traffic Analytics

We utilize upstream carrier fraud-detection tools and real-time analytics to monitor for anomalous call traffic patterns that may indicate robocall activity. Suspicious activity is escalated and investigated immediately. Where necessary, outbound traffic is temporarily suspended pending resolution.

Customer Vetting and Controls

We do not allow anonymous provisioning. All clients are vetted prior to onboarding. Clients must agree to a written Acceptable Use Policy that explicitly prohibits spoofing, unsolicited autodialed or prerecorded calls to mobile numbers or residential lines, and use of false or misleading caller ID. Clients found in violation are subject to immediate service suspension or termination.

Future STIR/SHAKEN Implementation

We have initiated the process of obtaining our SPC token and STIR/SHAKEN certificate. Once received, we will sign all U.S.-bound calls using our own certificate via a hosted signing service. Upon completion, we will amend this filing to reflect complete STIR/SHAKEN implementation in accordance with FCC 24-120.

Contact for Mitigation Program

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