

Robocall Mitigation Program Description

Company Information

- **Company Name:** Callsto LLC
- **FCC Registration Number (FRN):** 0033246307
- **Point of Contact:** Henry A. Sickler, support@callsto.net, 501-274-0248
- **Service Type:** VoIP Service Provider

1. Overview of Mitigation Practices

Callsto LLC is committed to preventing the origination and transmission of illegal robocalls on our network. We have implemented a comprehensive Robocall Mitigation Program, including stringent customer vetting, real-time call pattern monitoring, analytics-driven call blocking, and full participation in traceback activities. These efforts are designed to ensure our compliance with FCC rules and maintain the integrity of our voice services.

2. STIR/SHAKEN Implementation Status

Callsto LLC has not yet fully implemented STIR/SHAKEN due to existing non-IP portions of our voice network. We are actively transitioning our infrastructure and plan to enable full STIR/SHAKEN capabilities on all SIP-based traffic by Q4 2025.

3. Specific Mitigation Measures

To reduce the risk of unlawful robocalls, we have implemented the following mitigation strategies:

Customer Vetting (KYC): All prospective customers are required to undergo identity verification, provide business credentials, and complete a traffic use case questionnaire.

Outbound Traffic Monitoring: We use automated systems to detect suspicious call patterns, such as short-duration, high-volume calls and anomalous calling to unallocated or invalid numbers.

Call Blocking: We block calls with malformed, unassigned, or spoofed caller IDs at the network level.

Third-Party Analytics: We utilize industry-standard call analytics and robocall scoring tools to assess traffic risk in real time.

Remediation: Any customer found to be originating or facilitating unlawful robocalls is immediately investigated, and service is suspended if warranted.

4. Traceback Participation

Callsto LLC fully participates in industry traceback efforts, including those coordinated by the US Telecom Industry Traceback Group (ITG). We respond to all traceback requests in a timely and cooperative manner and assist in identifying the source of any unlawful traffic.

5. Call Authentication Practices (Partial STIR/SHAKEN)

Callsto LLC has implemented STIR/SHAKEN on SIP-enabled portions of our network. Calls originating on our IP platform are signed with full or partial attestation, depending on customer verification. We pass authenticated calls to downstream carriers when supported.

6. Point of Contact for Robocall Issues

Contact Name: Henry A. Sickler

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