

Robocall Mitigation Program Description

FCC Robocall Mitigation Database Submission

Provider Type: Voice Service Provider

Robocall Mitigation and STIR/SHAKEN Status

Swordfish Business provides outbound VoIP services to end users, including SIP trunking and hosted PBX deployments. We currently operate with partial STIR/SHAKEN implementation, but are in the process of completing full implementation in cooperation with our primary upstream provider, VoIP Innovations.

We are actively onboarding with the STI-PA framework and will be using FCC-issued certificates to sign all outbound calls through VoIP Innovations. Once fully provisioned, all eligible calls originating from our network will be signed in accordance with the STIR/SHAKEN framework.

Current Robocall Mitigation Practices

Until full STIR/SHAKEN coverage is finalized, we continue to mitigate illegal robocalls through the following measures:

- Know Your Customer (KYC): All customers are vetted through identity verification, business use case analysis, and terms of service acceptance before voice services are enabled.
- Traffic Pattern Analysis: We monitor call traffic for red flags such as high-volume bursts, short-duration calls, sequential dialing, and abnormal answer/fail rates.
- Automated & Manual Review: Suspicious call traffic is flagged by automated rules and reviewed manually. Service may be suspended pending investigation.
- Call Blocking: We block known bad actors using internal blacklists and third-party analytics.
- Traceback Compliance: We cooperate with the USTelecom Industry Traceback Group (ITG) and promptly respond to traceback requests from carriers and government agencies.
- Customer Enforcement: Clients are required to adhere to our strict anti-abuse Acceptable Use Policy (AUP), with violations resulting in service suspension or termination.

Point of Contact

Company: Swordfish Business

Contact Name: Dan Williams

Phone: 813.982.9195

Email: danw@swordfishbiz.com

Address: 222 Bryan Road, Brandon, FL 33511

Certification Statement

I certify under penalty of perjury that:

1. Swordfish Business has implemented the above-described robocall mitigation practices for the voice traffic we originate.
2. The information submitted is accurate to the best of my knowledge.
3. We are actively transitioning to complete STIR/SHAKEN implementation using FCC-approved credentials and partner infrastructure.

Signed:

Dan Williams

Officer of Swordfish Business

June 19, 2025