

Rozper Limited

Robocall Mitigation Program

1. Regulatory Status

Rozper Limited is a telecommunications service provider that holds an Operating Company Number (OCN) and complies with applicable Federal Communications Commission (FCC) regulations.

This Robocall Mitigation Program outlines the reasonable and effective measures implemented to prevent the origination, carrying, or processing of illegal robocall traffic.

2. Governance & Compliance Oversight

Rozper Limited maintains a strict zero-tolerance policy toward:

- Illegal robocalls
- Caller ID spoofing
- Fraudulent traffic origination
- Abusive telecommunications practices

A designated Compliance Officer oversees:

- FCC Robocall Mitigation Database (RMD) filings
- STIR/SHAKEN compliance
- Customer onboarding controls
- Traceback coordination
- Quarterly compliance audits

Policies are reviewed annually and updated upon regulatory changes.

3. STIR/SHAKEN Implementation

Rozper Limited has implemented STIR/SHAKEN caller authentication in accordance with FCC requirements under 47 CFR § 64.6301 and § 64.6302.

Our implementation includes:

- Full A-level attestation where appropriate
- B-level or C-level attestation when required based on call origination verification
- Authentication of SIP signaling using digital certificates issued by an approved STI-CA
- Ongoing certificate management and renewal
- Secure key storage and credential controls

Outbound calls are authenticated prior to transmission where technically feasible. Inbound calls are validated, and authentication failures are analyzed and, where necessary, blocked or flagged for review.

4. Customer Due Diligence & Onboarding Controls

Prior to service activation, Rozper Limited conducts enhanced due diligence:

Mandatory Requirements:

- Executed service agreement with anti-robocall and anti-spoofing clauses
- Government-issued ID and/or business registration documents
- Beneficial ownership disclosure (where applicable)
- Operational website verification
- Traffic profile declaration (use case, call type, estimated volumes)

Risk Classification:

Customers are categorized as:

- Low Risk
- Medium Risk
- High Risk

High-risk customers require management approval and enhanced monitoring.

5. Network Authorization & Access Controls

To prevent unauthorized origination:

- All SIP interconnections require prior authorization
- IP authentication and credential-based access controls are enforced
- Routing permissions are defined per customer
- Unauthorized traffic is automatically blocked
- Access credentials are periodically reviewed

6. Traffic Monitoring & Analytics

Rozper Limited deploys advanced real-time analytics systems to detect:

- Sudden traffic spikes
- High short-duration call ratios
- Sequential dialing patterns
- Rapid caller ID rotation
- Invalid or spoofed CLI usage
- Abnormal complaint ratios

Daily monitoring reports are reviewed by compliance personnel. Suspicious traffic is immediately investigated and blocked if confirmed to be unlawful.

7. Caller ID Validation & Spoofing Prevention

The following controls are enforced:

- Blocking of invalid, unallocated, or malformed caller IDs
- Rejection of known fraudulent number ranges
- Geographic mismatch analysis (where applicable)
- Real-time flagging of suspicious CLI patterns

- Enforcement of attestation-level integrity under STIR/SHAKEN

8. Blocking & Enforcement Policy

Rozper Limited enforces a zero-tolerance policy:

- Suspicious accounts are immediately reviewed
- Traffic may be throttled or suspended during investigation
- Confirmed violators are permanently terminated
- Resellers are contractually obligated to monitor and block downstream offenders

9. Traceback & Regulatory Cooperation

Rozper Limited fully cooperates with:

- The U.S. Traceback Consortium
- The Federal Communications Commission (FCC)
- Law enforcement authorities

Traceback requests are acknowledged and responded to within 24 hours.

We:

- Identify upstream and downstream traffic sources
- Suspend suspicious customers during investigation
- Permanently terminate confirmed violators
- Maintain detailed call records for investigative support

10. Training & Internal Controls

Staff receive regular training covering:

- STIR/SHAKEN operational procedures
- FCC robocall regulations

- Traffic anomaly detection
- Escalation protocols

11. Audit & Continuous Improvement

Rozper Limited conducts periodic audits of:

- STIR/SHAKEN attestation accuracy
- Traffic monitoring effectiveness
- Customer compliance controls
- Mitigation rule performance