



Filer Name: Cybtel LLC

FRN: 0034938753

Filing Type: Voice Service Provider

Certification Type: Partial STIR/SHAKEN Implementation

STIR/SHAKEN Exemption Cited: 47 CFR § 64.6304(a)(2)

1. Explanation of STIR/SHAKEN Exemption

Cybtel LLC provides international Voip voice services to users through its proprietary mobile application. While a portion of our infrastructure supports SIP interconnects, we rely on upstream wholesale carriers for a significant portion of call termination. These carriers do not always support STIR/SHAKEN or provide SIP end-to-end signalling paths. As a result, we are unable to fully implement the STIR/SHAKEN authentication framework across our entire network.

Due to this lack of control over critical network infrastructure, we qualify for an exemption under **47 CFR § 64.6304(a)(2)** — the provider cannot obtain the necessary SIP interconnections to support STIR/SHAKEN.

2. Reasonable Steps to Mitigate Illegal Robocalls

Cybtel implements the following procedures:

- **User Verification & KYC:**
All customers are onboarded through our app and must verify their identity using a valid phone number and email. Suspicious users are flagged automatically, and accounts may be disabled based on activity reviews.
- **Traffic Monitoring & Anomaly Detection:**
We analyse outbound call traffic to detect abnormal patterns, including high call volumes, short-duration calls, and repeated call attempts. Any such activity is automatically blocked and flagged for review.
- **Call Origination Controls:**
Only verified app users are permitted to originate calls. We do not offer call origination APIs or connections to other third-party systems or resellers.
- **Traceback Compliance:**
Cybtel commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) within 24 hours. We actively cooperate with investigations and take immediate action on confirmed abuse.
- **Customer Vetting Policies:**
We continuously evaluate user behaviour to ensure that our platform is not being used to facilitate



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mass robocalling or spoofing. We reserve the right to terminate any account suspected of violating these standards.

3. Analytics Systems and Vendors

At this time, Cybtel utilises internal monitoring tools to analyse outbound traffic and detect potential misuse. We are currently evaluating partnerships with external analytics providers to strengthen our detection capabilities.

4. Third-Party Providers

Cybtel uses upstream wholesale carriers for international and U.S. call termination. These carriers are vetted and monitored for compliance. We do not sell or reassign access to our outbound channels to external resellers or white-label partners.

5. Point of Contact

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