

REDACTED VERSION – FOR PUBLIC INSPECTION

**Robocall Mitigation Program for
Callyo 2009 Corp.
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This Robocall Mitigation Program (“Program”) to be filed in the Federal Communications Commission (“FCC” or “Commission”) Robocall Mitigation Database (“RMD”) applies to Callyo 2009 Corp. (the “company”).

1. Provider Type Explanation (47 CFR § 64.6305(d)(2)(i))

The company does not have an obligation to implement STIR/SHAKEN because it both lacks the facilities necessary to do so and lacks the qualifications to obtain an SPC token. The company cannot fully implement STIR/SHAKEN because it does not own or control the transmission facilities or other supporting infrastructure its services run on. The company runs its service over third-party provider networks who control the network infrastructure and can implement STIR/SHAKEN. The company has therefore not implemented the STIR/SHAKEN authentication framework in the IP portions of its network

2. Traceback Commitment (47 CFR § 64.6305(d)(2)(iii))

The company commits to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

3. Robocall Mitigation Database Certification (47 CFR § 64.6305(d)(1))

The company certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

4. Investigation Certification (47 CFR § 64.6305(d)(2)(iv)).

The company certifies that it is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

5. Robocall Mitigation Techniques (47 CFR § 64.6305(d)(2)(ii))

- a. How the company is meeting the obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, including related contractual provisions.**

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- b. “Know-your-upstream provider” procedures in place designed to mitigate illegal robocalls, including related contractual provisions.

[REDACTED]

- c. Call analytics systems used to identify and block illegal traffic.

[REDACTED]

- d. Additional information on the Company’s reasonable steps to avoid carrying or processing illegal robocalls.

[REDACTED]