

Robocall Mitigation Program

SIP CREW, LLC

SIP CREW, LLC is a wholesale Voice over IP (VoIP) service provider. SIP CREW, LLC operates as an **originating provider** and, where applicable, as an **intermediate provider**, depending on the call flow, customer relationship, and network configuration.

SIP CREW, LLC certifies that all calls that originate on or transit through its network are subject to this Robocall Mitigation Program, which is consistent with **47 CFR § 64.6305(a)**. This program includes reasonable and effective steps designed to prevent the origination and transit of illegal robocalls, spoofed calls, and fraudulent traffic.

SIP CREW, LLC commits to responding fully and **within 24 hours** to all traceback requests received from the **Federal Communications Commission (FCC)**, law enforcement agencies, and the **USTelecom Industry Traceback Group**, and to cooperate fully in investigating and stopping illegal robocall activity.

Role as an Originating and Intermediate Provider

As an **originating provider**, SIP CREW, LLC maintains a direct relationship with its customers and takes responsibility for customer onboarding, traffic monitoring, caller authentication, and enforcement actions to prevent illegal robocalls from originating on its network.

As an **intermediate provider**, SIP CREW, LLC transits call traffic between networks and takes reasonable measures to ensure that traffic passing through its network does not facilitate illegal robocalls. SIP CREW, LLC preserves STIR/SHAKEN authentication information where present and cooperates fully in traceback investigations involving transiting traffic.

STIR/SHAKEN Implementation and Call Authentication

SIP CREW, LLC has implemented the **STIR/SHAKEN call authentication framework** in accordance with applicable FCC rules. Where technically feasible, SIP CREW, LLC authenticates calls that originate on its network and applies the appropriate attestation level based on the specific call scenario and level of caller identity verification:

- **Attestation A (Full Attestation):** Applied when SIP CREW, LLC has a direct authenticated relationship with the calling customer and can verify the customer's right to use the calling number.

- **Attestation B (Partial Attestation):** Applied when SIP CREW, LLC has a direct relationship with the customer but cannot fully verify the customer's right to use the calling number.
- **Attestation C (Gateway Attestation):** Applied when SIP CREW, LLC acts as an intermediate or gateway provider and cannot authenticate the source of the call beyond the point of entry into its network.

For calls that transit SIP CREW, LLC's network, SIP CREW, LLC preserves valid STIR/SHAKEN Identity headers and does not knowingly strip authentication information.

Where STIR/SHAKEN authentication is not technically feasible, SIP CREW, LLC relies on the robocall mitigation measures described below.

Fraud Prevention, Call Analytics, and Network Monitoring

SIP CREW, LLC actively protects its network from scam, spoofed, and fraudulent traffic by utilizing **Fraud Central** and internal call analytics tools deployed on its switching infrastructure. These tools are used to monitor call volumes, calling patterns, traffic trends, and anomalous behavior that may indicate illegal robocall activity.

Suspicious traffic is investigated promptly, and appropriate mitigation actions are taken, including warning, blocking, suspension, or termination of service.

Know-Your-Customer (KYC) and Customer Due Diligence

SIP CREW, LLC performs **Know-Your-Customer (KYC)** due diligence during customer onboarding and throughout the customer lifecycle. Customers are screened to verify business legitimacy, intended use of services, and compliance with applicable federal and state laws governing robocalls.

Customers are contractually prohibited from using SIP CREW, LLC's services for illegal robocalling, spoofing, or fraudulent activity.

Blocking, Suspension, and Enforcement

If SIP CREW, LLC determines that a customer is originating or transiting illegal robocalls, SIP CREW, LLC may immediately block, suspend, or terminate the customer's service. Enforcement actions are taken promptly to prevent further misuse of the network.

Upstream Provider Due Diligence

SIP CREW, LLC exercises due diligence before accepting traffic from upstream providers. SIP CREW, LLC accepts traffic only from providers that are registered in the **FCC Robocall Mitigation Database** or otherwise compliant with applicable FCC requirements. Upstream provider compliance is monitored on an ongoing basis.

Traceback Cooperation

SIP CREW, LLC cooperates fully with traceback investigations and commits to responding to all traceback requests **within 24 hours**. SIP CREW, LLC works closely with the FCC, law enforcement agencies, and the Industry Traceback Group to identify the source of illegal robocalls and to prevent recurrence.

Certification

I certify on behalf of SIP CREW, LLC that all calls that originate on or transit SIP CREW, LLC's network are subject to this Robocall Mitigation Program, that any prior certification has not been removed by FCC action, and that SIP CREW, LLC complies with all applicable FCC robocall mitigation and STIR/SHAKEN requirements.

Date: _____

Name: _____

Title: _____

Signature: _____