

ROBOCALL MITIGATION PROGRAM DESCRIPTION

AMR TELECOM LLC

I. Introduction

AMR Telecom LLC ("AMR Telecom" or the "Company") submits this Robocall Mitigation Program Description in compliance with the Federal Communications Commission's (FCC) rules regarding the Robocall Mitigation Database.

As indicated in our filing, AMR Telecom is a Voice Service Provider serving end-users. Currently, the Company has selected the certification option indicating "**No STIR/SHAKEN Implementation**" because we are currently in the process of obtaining STIR/SHAKEN certification. Pursuant to 47 C.F.R. § 64.6305(a), AMR Telecom has implemented the following reasonable steps to avoid originating illegal robocall traffic.

II. Mitigation Measures

To prevent the origination of illegal robocalls, AMR Telecom employs a multi-faceted approach consisting of "Know Your Customer" (KYC) protocols, traffic monitoring, and enforcement mechanisms.

A. Know Your Customer (KYC) Protocols

AMR Telecom does not grant network access to anonymous entities. Before onboarding any new customer, the Company conducts a vetting process that includes:

1. **Identity Verification:** Collecting and verifying the customer's physical business address, contact person, and valid contact information (email and phone).
2. **Business Legitimacy:** Verifying the customer's corporate registration and nature of business to ensure they have a legitimate need for voice origination services.
3. **Acceptable Use Policy (AUP):** Requiring all customers to sign a service agreement that explicitly prohibits the use of the network for illegal robocalling, spoofing, or telemarketing violations.

B. Traffic Monitoring and Analysis

AMR Telecom actively monitors traffic patterns to identify anomalies indicative of illegal robocalling. Our monitoring systems look for specific high-risk indicators, including but not limited to:

1. **Short Duration Calls:** High volumes of calls with very short duration (e.g., under 6 seconds).

2. **Low Completion Rates:** A disproportionately low Answer Seizure Ratio (ASR), suggesting that calls are being rejected or ignored by recipients.
3. **High Volume Bursts:** Sudden, unexplained spikes in call volume from a single source.
4. **Invalid Caller ID:** Attempts to originate calls using unassigned, invalid, or unallocated numbers.

C. Investigation and Enforcement

Upon detecting suspicious activity or receiving a credible complaint, AMR Telecom takes the following steps:

1. **Immediate Investigation:** The Company analyzes the specific call detail records (CDRs) associated with the suspicious traffic.
2. **Customer Inquiry:** We contact the customer responsible for the traffic to request an explanation and evidence of consent for the calls in question.
3. **Suspension and Termination:** If a customer fails to provide a satisfactory explanation, or if the traffic is determined to be illegal, AMR Telecom reserves the right to immediately suspend or terminate the customer's service.

III. Commitment to Traceback Cooperation

Pursuant to FCC requirements, AMR Telecom is fully committed to cooperating with traceback requests.

1. **Response Time:** We commit to responding fully to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium within twenty-four (24) hours of receipt.
2. **Cooperation:** We will provide all necessary data to help identify the source of suspicious traffic and will cooperate in investigations to stop illegal robocallers from using our service.
3. **Designated Contact:** As listed in our filing, our designated contact for these matters is **Shane Johnson, CEO** (admin@amrtelecomllc.com).

IV. STIR/SHAKEN Implementation Status

AMR Telecom acknowledges its obligation to implement the STIR/SHAKEN authentication framework. We are currently in the process of obtaining the necessary certificates and technical capability to sign calls. We anticipate transitioning to a "Partial" or "Complete" implementation status in the near future. Until that implementation is complete, this Robocall Mitigation Program serves as our primary defense against illegal robocalls.