

SAVITELE INC. ROBOCALL MITIGATION PLAN

Submitted Pursuant to 47 C.F.R. §64.6305

FCC Robocall Mitigation Database Filing

Company Name	Savitele, Inc
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1. Purpose and Regulatory Basis

Savitele, Inc (hereinafter "the Company") is a wholesale telecommunications carrier providing voice transit and origination services. This Robocall Mitigation Plan ("Plan") is submitted in compliance with the Federal Communications Commission's rules at 47 C.F.R. §64.6305, as adopted in the Second Report and Order in CG Docket No. 17-59 and WC Docket No. 17-97.

This Plan describes the specific, concrete steps the Company has implemented and will maintain to prevent the origination of illegal robocall traffic on its network. The Company does not claim full STIR/SHAKEN implementation across all traffic and instead submits this robocall mitigation plan as permitted under the Commission's rules for carriers that cannot fully implement STIR/SHAKEN due to network architecture limitations.

2. Company Overview and Network Description

The Company operates as a wholesale voice carrier, providing the following services:

- Wholesale voice origination and termination services
- SS7 and SIP-based interconnection to downstream carriers and enterprise customers

- Transit services for inter-carrier traffic exchange

The Company does not directly serve end-user consumers. All traffic originates from authenticated business customers operating under executed service agreements. As a wholesale carrier, the Company occupies a middle layer in the call path, receiving traffic from upstream customers and routing it to downstream terminating carriers.

3. Customer Onboarding and Know Your Customer (KYC) Procedures

3.1 Pre-Onboarding Due Diligence

Prior to provisioning service for any new customer, the Company performs the following verification steps:

- Verification of legal business entity through state business registry lookup or equivalent
- Collection of federal Employer Identification Number (EIN) or equivalent tax identification
- Review of intended use case and anticipated traffic volume and patterns
- Assessment of customer's prior carrier relationships and references where applicable
- Screening against known bad actor databases and industry blacklists

3.2 Contractual Requirements

All customers must execute a Master Service Agreement (MSA) containing an Acceptable Use Policy (AUP) that:

- Expressly prohibits origination of illegal robocalls as defined under the Telephone Consumer Protection Act (TCPA) and the Truth in Caller ID Act
- Prohibits caller ID spoofing for fraudulent or harmful purposes
- Requires customer compliance with all applicable FCC rules and regulations
- Grants the Company the right to immediately suspend service upon evidence of policy violation
- Requires customers to flow down equivalent restrictions to any of their own downstream customers

3.3 Ongoing Customer Review

The Company conducts periodic re-verification of existing customers, including review of traffic patterns and, for high-volume accounts, annual re-execution of updated compliance certifications.

4. STIR/SHAKEN Implementation Status

The Company has taken the following steps with respect to STIR/SHAKEN call authentication:

- The Company has obtained a Service Provider Code (SPC) token from the Policy Administrator (PA) and maintains a valid certification
- STIR/SHAKEN signing is implemented on IP-based SIP traffic where technically feasible
- For traffic traversing legacy TDM/SS7 infrastructure where STIR/SHAKEN cannot be applied, the Company relies on the robocall mitigation measures described in this Plan
- The Company passes through STIR/SHAKEN attestation information received from upstream providers without stripping or degrading the attestation level

The Company commits to expanding STIR/SHAKEN coverage as network migration to IP-based infrastructure continues, consistent with FCC timelines and technical feasibility.

5. Traffic Monitoring and Anomaly Detection

5.1 Monitoring Practices

The Company employs the following measures to monitor traffic for indicators of illegal robocall activity:

- Regular review of Call Detail Records (CDRs) for anomalous patterns including high call volume from a single source, short average call duration, and sequential or predictive dialing patterns
- Monitoring for sudden traffic spikes inconsistent with a customer's historical usage baseline
- Review of calls to known Do-Not-Call registered numbers where detectable
- Cross-referencing originating numbers against industry-published robocall number databases where commercially available

5.2 Response Thresholds

When anomalous traffic patterns are identified, the Company's designated compliance personnel will:

- Contact the originating customer within one (1) business day to request explanation
- Suspend traffic from the identified source pending satisfactory explanation if the pattern is consistent with illegal robocalling
- Escalate to termination of service for customers who cannot provide a lawful explanation for suspicious traffic patterns

6. Traceback Cooperation

The Company recognizes the critical role of the Industry Traceback Group (ITG), operated by US Telecom, in identifying and tracing illegal robocall traffic. The Company commits to the following:

- Responding to all Traceback requests from the ITG within twenty-four (24) hours of receipt
- Designating a primary point of contact responsible for receiving and responding to Traceback inquiries
- Maintaining Call Detail Records (CDRs) for a minimum of two (2) years to support Traceback investigations
- Promptly taking action against customers identified as sources of illegal traffic through the Traceback process
- Cooperating fully with FCC Enforcement Bureau investigations

The Company's designated Traceback Point of Contact is:

Name	Jami Choudhury
Title	CEO
Email	jami@savitele.com
Phone	919.443.0211
Backup Contact	Ops Manager, savi-ops@savitele.com

7. Blocking and Enforcement Actions

The Company maintains the technical capability and internal procedures to take the following enforcement actions:

- Immediate blocking of traffic from a specific customer account or originating number range upon confirmation of illegal robocall activity
- Suspension or termination of customer service agreements for AUP violations
- Reporting of confirmed bad actors to the ITG and, where appropriate, to the FCC

The Company maintains a record of all enforcement actions taken against customers for robocall-related violations, including the date, nature of violation, and corrective action taken.

8. Downstream Provider Obligations

In connection with the Company's obligations as a voice service provider in the call path, the Company:

- Accepts traffic only from providers listed in the FCC's Robocall Mitigation Database, or verifies that upstream providers have active filings prior to accepting traffic
- Requires upstream customers to represent and warrant that traffic they deliver complies with all applicable laws and regulations
- Reserves the right to refuse traffic from any provider that has been the subject of FCC enforcement action or ITG cease-and-desist notification

9. Recordkeeping

The Company maintains the following records in support of this Plan:

- CDRs for all traffic transiting the Company's network, retained for a minimum of two (2) years
- Customer onboarding documentation including executed MSAs, AUPs, and KYC records
- Logs of all Traceback requests received and actions taken in response
- Internal enforcement action records for customer violations
- Documentation of any updates or amendments to this Plan

10. Plan Maintenance and Updates

This Plan will be reviewed at least annually and updated to reflect:

- Changes in FCC rules or enforcement guidance regarding robocall mitigation
- Material changes to the Company's network architecture or service offerings
- Lessons learned from Traceback responses or enforcement actions

Any material updates to this Plan will be reflected in an amended filing with the FCC's Robocall Mitigation Database within a reasonable time following the change.

11. Certification

I, the undersigned, am an authorized representative of Savitele, Inc and hereby certify that the information set forth in this Robocall Mitigation Plan is accurate and complete to the best of my knowledge. The Company is committed to the practices described herein and will take prompt action to investigate and remediate any instances of illegal robocall traffic that originate from or transit its network.



Authorized Signature

April 2nd 2026

Date

Jami Choudhury

Printed Name

CEO

Title

— END OF ROBOCALL MITIGATION PLAN —