

Robocall Mitigation Plan for Javelin Cybernetics LLC

Overview

Javelin Cybernetics LLC is a new voice service provider that will be offering voice services through an IP-based network, leveraging numbers from a third-party provider (presumably Bandwidth). We are in the process of building out our infrastructure and implementing the necessary systems to comply with the FCC's requirements, including the deployment of the **STIR/SHAKEN** caller authentication framework. As of the date of this submission, we are not yet fully operational and have not implemented **STIR/SHAKEN**, but we are taking the following steps to ensure compliance and mitigate illegal robocalls.

1. Steps to Implement STIR/SHAKEN

We understand our responsibility to implement STIR/SHAKEN as an IP-based provider. The following steps are part of our plan to meet full compliance:

- **STI Certificate:** We will obtain an STI (Secure Telephone Identity) certificate from an approved Certificate Authority (CA) to sign our calls. We plan to coordinate with our third-party number provider to ensure smooth integration of call signing.
- **STIR/SHAKEN Software Deployment:** We are actively working to deploy **STIR/SHAKEN** authentication software within our VoIP app infrastructure. This will allow us to:
 - Authenticate all outbound calls by signing the caller ID with our STI certificate.
 - Verify the authenticity of incoming calls to protect our users from illegal robocalls.
- **Full Deployment Timeline:** We expect to have **STIR/SHAKEN** fully operational across our entire network within the next twelve (12) months, at which point all originated and terminated calls will be authenticated.

2. Interim Robocall Mitigation Practices

Until **STIR/SHAKEN** is fully deployed, we are committed to implementing robust interim measures to prevent the origination of illegal robocalls through our service. These include:

- **Traffic Monitoring:** We will monitor call traffic for unusual patterns or anomalies that could indicate illegal robocalls. This includes analyzing high call volumes, short-duration calls, or patterns associated with known robocall schemes.
- **Collaboration with our provider:** Our selected number provider, (e.g. **Bandwidth**) will be selected based on their commitment and operational implementation of **STIR/SHAKEN** on their network. We will ensure that calls routed through their infrastructure benefit from their authentication framework while we work toward our own full compliance.
- **Blocking Known Robocallers:** We will work with industry partners to identify and block numbers associated with illegal robocall campaigns, using real-time data from the **industry traceback consortium**.
- **Compliance and Traceback:** We commit to responding fully and promptly to any traceback requests from the **FCC**, law enforcement, or the **industry traceback consortium**. We will cooperate fully with these entities

in identifying and stopping any illegal robocallers that attempt to use our service or that have hacked into our service.

3. Monitoring and Auditing

We will conduct regular audits of our traffic and network to ensure that our robocall mitigation efforts are effective. This includes:

- Routine analysis of call records and call volume patterns.
- Continuous monitoring for suspicious traffic.
- Regular reporting to the appropriate regulatory bodies, if necessary.

4. Future Compliance and Updates

As we progress toward full **STIR/SHAKEN** deployment, we will continue to update our robocall mitigation plan and ensure our operations are fully compliant with FCC rules. Our goal is to provide a trusted communication platform that protects consumers from the harm of illegal robocalls while ensuring compliance with all regulatory obligations.

5. Conclusion

Javelin Cybernetics LLC is committed to implementing **STIR/SHAKEN** and complying with all FCC regulations regarding robocall mitigation. Until full compliance is achieved, we will employ interim robocall mitigation measures to protect the integrity of our network and the communications ecosystem.

6. Contact Information

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