

Robocall Mitigation Plan

Company Name: Fazitel LLC

FRN: 0035785344

Service Type: Interconnected VoIP

Filing Year: 2026

Contact:

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Title: CEO

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1. Company Overview

Fazitel LLC is a VoIP service provider delivering voice services to retail and wholesale customers. The company originates and transits voice traffic to domestic and international networks.

We are committed to preventing illegal robocalls and complying with all applicable regulations established by the **Federal Communications Commission**, including requirements under the **TRACED Act** and related FCC orders.

2. STIR/SHAKEN Implementation Status

Fully Implemented

Fazitel LLC has implemented the **STIR/SHAKEN** framework across its IP network.

Capabilities include:

- Authentication of outbound calls
- Verification of inbound calls
- Attestation levels (A, B, C)
- Participation through approved certification authorities
- Use of secure STI certificates

Exceptions

If traffic cannot be authenticated due to technical limitations or because traffic originates outside the IP portion of the network, the company applies the robocall mitigation practices described below.

3. Robocall Risk Assessment

The company conducts ongoing monitoring of voice traffic to identify potential illegal robocalling patterns.

Risk indicators include:

- High call volumes with short durations
- Large call bursts
- High call failure ratios
- Traffic originating from high-risk customers
- Customer complaints
- Analytics provider alerts
- Traceback requests

Traffic that meets suspicious thresholds is flagged for investigation.

4. Customer Vetting and Know-Your-Customer (KYC)

Before enabling outbound calling capabilities, the company performs customer verification including:

- Business registration verification
- Identity verification of beneficial owners
- Physical address validation
- Intended use of service
- Traffic profile expectations
- Contractual obligations prohibiting illegal robocalling

High-risk customers may be subject to enhanced due diligence.

5. Traffic Monitoring and Analytics

The company uses automated and manual processes to monitor traffic patterns including:

- Real-time call analytics
- Automated robocall detection tools
- Reputation scoring
- Call pattern analysis
- Monitoring for spoofed caller IDs

Traffic determined to be suspicious may be:

- Blocked
- Rate-limited
- Subject to investigation
- Reported internally for compliance review.

6. Mitigation Actions

When suspicious or illegal robocall traffic is identified, the company may take the following actions:

- Immediate suspension of the originating account
- Blocking of specific numbers or trunks
- Notification to upstream/downstream providers
- Cooperation with traceback requests
- Termination of service for violating customers

Mitigation measures are documented and retained for compliance purposes.

7. Traceback Cooperation

The company cooperates with industry traceback efforts coordinated by organizations such as the **USTelecom Industry Traceback Group**.

Commitments include:

- Responding promptly to traceback requests
 - Identifying the source of suspicious traffic
 - Taking corrective actions when necessary
 - Maintaining records of investigations.
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8. Caller ID Authentication and Anti-Spoofing

The company prohibits the use of misleading or spoofed caller ID information.

Measures include:

- Verification of customer right to use numbers
 - CLI validation
 - Monitoring for spoofing patterns
 - Enforcement through customer agreements.
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9. Record Retention

The company maintains records relevant to robocall mitigation including:

- Customer onboarding documentation
- Traffic monitoring reports
- Complaint logs
- Traceback responses
- Mitigation actions

Records are retained in accordance with FCC guidance and company compliance policies.

10. Compliance Officer

The company designates a robocall mitigation compliance officer responsible for:

- Oversight of mitigation practices

- Regulatory updates
- FCC filings and certifications
- Traceback responses

Name: Abrar Aslam

Title: Compliance Officer

Email: abrar@fazitel.com

11. Annual Certification

The company certifies that:

- It has implemented STIR/SHAKEN where required, **or**
- It has implemented an effective robocall mitigation program.

This plan reflects the company's current practices and will be updated as regulations evolve.