

# Robocall Mitigation Database Plan

## Section 1: STIR/SHAKEN Implementation

SIP GALAXY LLC has partially implemented the STIR/SHAKEN framework for IP-based voice traffic. Implementation is currently active for all calls that traverse IP-based infrastructure where technically feasible. We are engaged with upstream providers to ensure continued expansion and full STIR/SHAKEN compliance as industry interoperability improves.

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## Section 2: Robocall Mitigation Program for Non-IP Traffic

For calls that cannot be authenticated under STIR/SHAKEN—such as legacy TDM-based traffic—SIP GALAXY maintains a comprehensive robocall mitigation program that includes:

- **Traffic Analysis & Monitoring:** Active monitoring of call patterns to detect anomalies such as high call volumes, short-duration calls, and repetitive dialing behaviors.
  - **Call Blocking:** Integration with third-party robocall detection services to identify and block known illegal robocall sources in real-time.
  - **Internal Heuristics:** Proprietary filters to flag traffic from potentially abusive sources.
  - **Logging & Reporting:** Full traceability and logging of call traffic for audit and review purposes.
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## Section 3: Customer Vetting & Onboarding

SIP GALAXY enforces strict **Know Your Customer (KYC)** protocols during customer onboarding to prevent the origination of illegal robocalls. This process includes:

- Verification of legal business status (e.g., EIN, incorporation documents).
  - Review of anticipated traffic patterns and business model.
  - Rejection of customers with unverifiable operations or high-risk indicators.
  - Ongoing monitoring of customer traffic with automated alerts for abnormal behavior.
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## Section 4: Traceback Cooperation

SIP GALAXY cooperates fully with the **Industry Traceback Group (ITG)** and other enforcement authorities. We respond promptly to all traceback requests in accordance with FCC regulations and industry best practices, typically within 24 hours.

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## Section 5: Complaint Resolution Process

We maintain dedicated support for robocall-related complaints. All complaints are logged and investigated promptly. If a customer is found to be the source of illegal robocalls, service is suspended or terminated based on the severity of the violation.

### Complaint Contact Information:

- ☐ abuse@sipgalaxy.com
- ☐ +1 (332) 777-4508

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## Section 6: Compliance Oversight

Robocall mitigation policies are overseen by the company's designated Compliance Officer:

### Kacper kawalski

Compliance Officer, SIP GALAXY LLC

- ☐ compliance@sipgalaxy.com
- ☐ +1 (332) 777-4508

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## Section 7: Certification Statement

"I, certify that SIP GALAXY has implemented the robocall mitigation practices described in this document in accordance with FCC regulations under 47 CFR § 64.6305(b). The company remains committed to protecting the integrity of the voice ecosystem and preventing the origination of unlawful robocalls."