

Robocall Mitigation Plan – ClearCom Network LLC

Company Name: ClearCom Network LLC

FCC FRN: 0037008406

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Filer Role: Intermediate or Originating Voice Service Provider

Plan Type: Non-STIR/SHAKEN (with robocall mitigation)

1. Description of Practices

ClearCom Network LLC has implemented a robocall mitigation program to prevent illegal and fraudulent robocall traffic from originating on its network. Our practices include:

- Customer Vetting: All customers undergo strict KYC (Know Your Customer) procedures, including business verification, identity checks, and usage case review.
- Traffic Monitoring: We actively monitor SIP traffic for signs of robocalling, including high-volume short-duration calls and unusual patterns.
- Automated Blocking: Calls flagged with known illegal robocall patterns (e.g., invalid CLIs, spoofed numbers) are automatically blocked.
- Third-Party Screening: We use third-party analytics providers and blacklist databases (e.g., Nomorobo, YouMail) to flag and score risky call behavior.
- Call Traceback Participation: We cooperate fully with traceback requests from the U.S. Traceback Consortium and regulatory agencies.

2. Enforcement Actions

Customers found to be violating robocall regulations are:

- Immediately suspended or terminated
- Reported to upstream carriers and applicable law enforcement if necessary

3. STIR/SHAKEN Status

ClearCom Network LLC is not currently capable of authenticating calls under STIR/SHAKEN due to:

- Lack of direct control over the telephone number resources (reseller relationship)

- Technical or financial limitations

We are actively working toward full STIR/SHAKEN implementation via third-party authorized providers and/or delegation from upstream carriers.

4. Contact for Robocall Complaints and Tracebacks

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We respond to traceback requests within 24 hours and comply with all traceback investigations.