

Amano Telecom LLC - Robocall Mitigation Program

Robocall Mitigation Plan

Amano Telecom LLC

1. Introduction

Amano Telecom LLC is committed to maintaining the highest standards of compliance with FCC regulations, particularly those under 47 CFR § 64.6305. As an intermediate provider currently in the process of implementing the STIR/SHAKEN authentication framework, we have established a comprehensive Robocall Mitigation Program to ensure the integrity of voice traffic traversing our network.

2. STIR/SHAKEN Implementation Status

Our STIR/SHAKEN deployment is partially complete. IP-based traffic from our core infrastructure is fully compliant. Migration of non-IP traffic and legacy systems is underway in collaboration with upstream providers. Full STIR/SHAKEN implementation will be completed in accordance with provider capabilities and infrastructure upgrades.

3. Traceback Commitment

Amano Telecom LLC responds to all traceback requests within 24 hours. This includes full cooperation with the Industry Traceback Group (ITG), the FCC, and other relevant authorities. We have assigned a dedicated compliance team responsible for handling and prioritizing all traceback inquiries.

4. Traceback Procedures

To identify and mitigate illegal robocall traffic, the following procedures are enforced:

- Real-time traffic monitoring for abnormal call patterns.
- Source IP and call log tracking for all incoming and outgoing calls.
- Automated and manual traceback flagging tools.
- Internal call routing history retained for at least 24 months.
- Segregation of suspicious traffic for further review.
- Immediate response coordination with upstream and downstream carriers.

5. Call Data Retention Policy

We maintain call routing and call detail records (CDRs) for all traffic traversing our network for a minimum of 24 months. These records include, but are not limited to:

- Source and destination numbers.

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- Call start and end timestamps.
- IP addresses involved in transmission.
- Protocol information and routing path data.

6. Robocall Prevention Measures

To prevent origination or transmission of illegal robocalls, the following controls are implemented:

- Traffic profile screening and whitelisting.
- Daily call volume pattern analysis.
- CLI validation and known spam number filtering.
- Blacklist integration from ITG and third-party reputation lists.
- Automated alerts for call spikes or suspicious behavior.

7. Compliance Monitoring

The company conducts monthly audits of call logs and mitigation rule effectiveness.

Our mitigation rules are revised based on traceback case analysis and evolving fraud patterns.

We report any confirmed illegal activity to the appropriate authorities.

8. Internal Governance

Amano Telecom LLC has designated a compliance officer and a support team for robocall mitigation.

This team oversees ongoing improvement of mitigation techniques and documents all responses and case closures.

Training is conducted quarterly for relevant staff.

9. Future Roadmap

We are fully committed to achieving complete STIR/SHAKEN implementation.

Until then, our Robocall Mitigation Program will remain in effect to ensure compliance and protect end users.

10. Contact Information

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This document is submitted in accordance with the FCC's Robocall Mitigation Database requirements.