

Robocall Mitigation Plan

Company Name: Brightstar Limited

FCC Registration Number (FRN): 0037018306

Filing Type: Voice Service Provider

Implementation of STIR/SHAKEN: No

1. Explanation of Services

Brightstar Limited is a UK-based voice service provider offering SIP trunking and VoIP services primarily to business customers in the United Kingdom. One of our UK customers operates a U.S. office and requested a U.S. telephone number for outbound calling. To support this, we provisioned a U.S. number via our wholesale provider, DIDWW, and enabled outbound VoIP services to the U.S. PSTN.

Although Brightstar Limited does not directly interconnect with the U.S. public telephone network, our upstream carrier (DIDWW) handles termination of U.S.-bound calls.

2. Robocall Mitigation Practices

While Brightstar Limited does not implement STIR/SHAKEN, we have robust measures in place to prevent and mitigate illegal robocall traffic:

- Know Your Customer (KYC): We onboard only verified business customers. This includes identity verification, business legitimacy checks, and use-case validation prior to service activation.
- Traffic Monitoring: Our systems monitor outbound traffic for irregular patterns such as call bursts, high-volume short-duration calls, or excessive simultaneous calls. Suspicious activity is flagged for review, and services may be suspended if necessary.
- Terms of Service Enforcement: Our Terms of Service prohibit the use of our platform for illegal robocalling, autodialing, or mass unsolicited calling. Breaches result in service suspension or termination.
- Complaint Handling: We promptly investigate complaints or traceback requests from U.S. authorities, industry traceback groups (such as USTelecom), or our upstream providers. We provide full cooperation in all such cases.
- Trusted Upstream Providers: Brightstar Limited only routes U.S. traffic via trusted providers such as DIDWW, who maintain their own compliance with U.S. robocall mitigation regulations and perform authentication where applicable.

3. STIR/SHAKEN Implementation Status

Brightstar Limited has not implemented STIR/SHAKEN for the following reasons:

- We are a foreign-based provider operating entirely outside of the United States.
- We do not maintain direct IP interconnection with the U.S. telephone network. All outbound U.S. traffic is routed through upstream providers (e.g., DIDWW).
- There is no current STIR/SHAKEN mandate in the UK, and our network infrastructure is based in a jurisdiction where such implementation is not required or supported.
- Our upstream providers may apply STIR/SHAKEN headers on our behalf if supported by their infrastructure.

4. Conclusion

Brightstar Limited is committed to combatting illegal robocalls and enforcing responsible use of our voice services. We maintain a proactive stance on customer verification, traffic monitoring, and collaboration with U.S. authorities and traceback entities. We continue to monitor industry standards and regulatory developments to ensure ongoing compliance.