

Robocall Mitigation Program Description for Appello VoIP, LLC

Company Name: Appello VoIP, LLC

FRN: 0037057635

Filer Type: Voice Service Provider

Certification Type: Partial STIR/SHAKEN Implementation

1. Description of STIR/SHAKEN Implementation

Appello VoIP, LLC has **partially implemented STIR/SHAKEN** in its IP-based voice network. All outbound calls that traverse fully IP-based infrastructure are **signed with STIR/SHAKEN tokens** in accordance with ATIS standards. However, a portion of Appello's traffic either:

- Terminates or originates over **non-IP (TDM) infrastructure**, or
- Is routed through **intermediate carriers** that have not yet fully adopted STIR/SHAKEN protocols.

Appello VoIP, LLC continues to expand its STIR/SHAKEN coverage by upgrading legacy systems and coordinating with upstream and downstream providers.

2. Robocall Mitigation Measures

For all traffic not authenticated via STIR/SHAKEN, Appello VoIP, LLC has implemented a **comprehensive robocall mitigation program** that includes the following:

- **Know-Your-Customer (KYC):**
All customers are verified through a strict onboarding process that includes identity verification, service use intent, and traffic pattern risk analysis. Appello does not allow anonymous access to its voice services.
- **Traffic Monitoring and Analytics:**
We continuously monitor outbound traffic to detect abnormal calling patterns that may indicate illegal robocall campaigns. Traffic is analyzed for:
 - High call volumes with short durations
 - Invalid or spoofed caller IDs
 - Known scam patterns flagged by industry traceback groups

- **Traceback Participation:**

Appello VoIP, LLC actively **cooperates with the Industry Traceback Group (ITG)** and other authorized enforcement bodies by responding to traceback requests in a timely manner and taking corrective actions against violators.

- **Immediate Action Against Violators:**

Any customer found to be originating illegal or abusive robocalls is subject to immediate suspension or termination of service.

3. Commitment to Full STIR/SHAKEN Implementation

Appello VoIP, LLC is committed to achieving **full STIR/SHAKEN compliance**. Ongoing efforts include:

- Network upgrades to replace or integrate non-IP infrastructure
- Engaging with intermediary providers to promote STIR/SHAKEN compliance
- Reviewing new technologies and solutions to accelerate full deployment

4. Contact Information for Robocall Mitigation

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