

Robocall Mitigation Program Description

Company Name: ZMZ Networks LLC

FCC Registration Number (FRN): 0037086477

Business Address: 1001 S. Main Street, Suite 600, Kalispell, MT 59901-5635, USA

Contact Information:

Name: Farrukh Mateen

Title: Chief Executive Officer (CEO)

Department: Executive

Address: 1001 S. Main Street, Suite 600, Kalispell, MT 59901-5635, USA

Telephone: +1 (251) 901-5232

Email: farrukh@zmznetworks.com

1. Type of Provider

ZMZ Networks LLC operates as both a Voice Service Provider and Gateway Provider within the United States.

2. STIR/SHAKEN Implementation

ZMZ Networks LLC has partially implemented the STIR/SHAKEN framework:

- All originated calls are subject to a robocall mitigation program in accordance with 47 CFR § 64.6305(a).
- All calls carried or processed by the network are covered under a robocall mitigation program per 47 CFR § 64.6305(b).
- STIR/SHAKEN has been deployed on a portion of the company's network, with full compliance on that portion.

- The company is committed to expanding STIR/SHAKEN implementation as further network upgrades are completed.

3. Robocall Mitigation Practices

Customer Vetting:

- All retail and wholesale customers undergo a comprehensive verification process, including the collection of government-issued identification, business registration documents, and tax identification numbers.
- Enhanced due diligence is applied to wholesale clients and international traffic originators.

Call Monitoring:

- ZMZ Networks LLC performs daily monitoring of network traffic using internal tools and third-party analytics to detect signs of potential robocall activity.
- Call detail records (CDRs) are scrutinized for anomalies such as excessive call volume, brief call durations, or repetitive patterns.

Mitigation Actions:

- Upon detection of suspicious activity, the company conducts immediate investigations. Mitigation measures may include issuing warnings, suspending services, or terminating accounts.
- Detailed records of mitigation actions are maintained for regulatory review.

Telephone Number Validation:

- All telephone numbers used by clients are validated to confirm assignment by ZMZ Networks LLC or verified through proper ownership documentation.

4. Third-Party Call Analytics

ZMZ Networks LLC employs third-party analytics tools to enhance detection of robocall activity.

These tools offer capabilities such as:

- Blacklisting of high-risk numbers
- Real-time scanning of call traffic
- Reputation analysis of calling numbers

5. Traceback and Law Enforcement Cooperation

- ZMZ Networks LLC commits to responding to traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) within 24 hours.
- The company cooperates fully with all investigations and promptly acts to terminate illegal call traffic if identified.

6. Affirmations

- ZMZ Networks LLC confirms that it has not been the subject of any formal enforcement actions or findings related to robocalling violations in the past two years.
- The company further affirms that no previous robocall mitigation certification has been revoked by the Commission.

Officer Declaration

I, Farrukh Mateen, CEO of ZMZ Networks LLC, hereby certify that the information contained in this Robocall Mitigation Program Description is accurate and complete to the best of my knowledge.

Signature: Farrukh Mateen

Date: May 29, 2025