

ROBOCALL MITIGATION POLICY

Effective Date: May 29, 2025

1. Purpose

This policy documents the steps **Spirewind LLC** ("the Company") takes to prevent unlawful or unwanted robocalls from entering or traversing the public switched telephone network (PSTN) through its hosted PBX and SIP services. It is filed pursuant to 47 C.F.R. § 64.6305 and FCC Order 20-136.

2. Scope & Service Model

The Company provides hosted PBX and SIP endpoints exclusively to a small base of **personally known, pre-vetted business customers**. All outbound PSTN traffic is handed off—via secure SIP trunks—to Telnyx, LLC, an FCC-certified Intermediate/Terminating Provider that signs calls with STIR-SHAKEN. The Company does **not**:

- Originate traffic for the general public;
- Resell or transit calls from third-party providers;
- Hold telephone numbers or an SPC token;
- Operate TDM interconnects.

3. Know-Your-Customer (KYC) Procedures

- **Identity Verification:** Each prospective customer must provide legal business name, address, EIN, and government-issued photo ID of an authorized officer.
- **Service Agreement:** Customers sign a Master Service Agreement with explicit prohibitions on illegal robocalling, spoofing, and autodialer abuse.
- **Narrow Provisioning:** SIP credentials and PBX access are issued only to the verified entity and cannot be reassigned without re-verification.

4. Traffic Monitoring & Mitigation

- **Automated Analytics:** Daily reports flag anomalous spikes in call volume, short-duration calls (<15 sec), high failure rates, or large bursts to unique destinations.
- **Immediate Response:** Suspected abusive traffic triggers (i) call blocking or rate-limiting within 1 hour, and (ii) notification to the customer demanding written justification within 24 hours.
- **Service Termination:** Failure to remediate promptly results in suspension or permanent disconnection.

5. STIR-SHAKEN & Call Authentication

Because the Company lacks numbering resources and transports all PSTN traffic through Telnyx, it cannot obtain an SPC token. Telnyx applies STIR-SHAKEN authentication at the point of egress. The Company will deploy its own signing solution if it acquires numbering authority in the future.

6. Traceback & Law-Enforcement Cooperation

The Company designates the undersigned Robocall Mitigation Point-of-Contact (RM-POC) to:

1. Acknowledge traceback requests from the Industry Traceback Group or government agencies within **24 hours**;
2. Furnish call detail records within **48 hours**; and
3. Block or reroute traffic as directed by lawful order.

7. Recordkeeping & Reporting

All KYC records, call analytics, mitigation actions, and traceback correspondence are retained for **24 months** and made available to the FCC on request. The Company updates its FCC Robocall Mitigation Database filing within **10 business days** of any material change.

8. Policy Review

This policy is reviewed annually—or sooner if required by new FCC rules—to ensure continued effectiveness.

9. Contact Information

Robocall Mitigation Point-of-Contact

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Phone: +12602651770

Authorized Signature: _____

Date: _____

 5/29/2025