

Robocall Mitigation Program Description

Lucky Fiber LLC

FCC Registration Number (FRN): 34822973

Date: 6/2/2025

1. Overview

Lucky Fiber LLC is a VoIP reseller that provides voice services to a limited number of customers. All outbound calls are routed through our upstream provider, VoIP.ms, which controls the SIP infrastructure and performs STIR/SHAKEN call authentication.

Lucky Fiber LLC does not originate calls onto the public switched telephone network (PSTN) using our own facilities, nor do we have direct access to numbering resources. As such, we are exempt from the STIR/SHAKEN implementation obligation under **47 CFR § 64.6304(a)(2)**.

2. Mitigation Measures

Although Lucky Fiber LLC has not implemented STIR/SHAKEN, we have developed and implemented a robocall mitigation program in compliance with **47 CFR § 64.6305(a)**, including the following measures:

- **Customer Vetting**
Before activating voice services, we verify the identity of each customer using valid business registration, government-issued identification, and payment verification. We do not provide services to anonymous users.
 - **Terms of Service Restrictions**
Our service agreement prohibits the use of our network for autodialing, illegal robocalling, or fraudulent calling practices. Violators are subject to immediate suspension or termination.
 - **Traffic Monitoring**
We monitor call traffic patterns for signs of abuse (e.g., high volume, short-duration calls) and investigate any anomalies or customer complaints.
 - **Response to Traceback Requests**
Lucky Fiber LLC is committed to fully and promptly responding to all traceback requests from the **FCC, law enforcement**, and the **Industry Traceback Group (ITG)** within 24 hours.
 - **Cooperation with Enforcement Agencies**
We fully cooperate with the Commission and other enforcement entities to stop illegal robocallers, including taking corrective action against customers who are found to be using our services for such purposes.
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3. Conclusion

Lucky Fiber LLC is committed to combating illegal robocalls and ensuring the integrity of the U.S. communications network. Although we are not currently required to implement STIR/SHAKEN due to our

status as a reseller without infrastructure control, we maintain a robust mitigation program and respond rapidly to any indications of misuse.