

Robocall Mitigation Program Description

Filer Name: Simple Communications LLP

FRN: 0037091014

Date: 06/02/2025

1. Provider Type & Role in Call Chain

We are a **Voice Service Provider without a STIR/SHAKEN implementation obligation** under 47 CFR § 64.6305. Our platform does not originate calls via API or automated systems; it facilitates **manual voice communications** through browser-based SIP endpoints.

2. Basis for Exemption from STIR/SHAKEN

We claim exemption under **47 CFR § 64.6304(g)** because:

- We **do not originate traffic using IP-based interconnections**, and
- We **do not offer service that supports SIP-based origination**.
All outbound traffic is originated manually through registered SIP clients (browser-based phones or external SIP phones). Our system does **not support programmatic or automated origination of calls**.

3. Mitigation Measures

Although exempt from STIR/SHAKEN obligations, we have implemented the following proactive mitigation strategies:

- **Know-Your-Customer (KYC):** We only allow account creation after email verification, and outbound calling is gated behind identity and payment verification.
- **Traffic Monitoring:** All call records, including destination, duration, and calling patterns, are logged and monitored for anomalies.
- **Manual Vetting:** No API or robodialing integrations are permitted. Every call is dialed by a verified human user.
- **Complaint Handling:** We provide an abuse contact and take immediate action on reported unwanted calls or suspected spam behavior.

4. Compliance Contact

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