

Company Name: Beparagon LLC
FCC Registration Number (FRN): 0037142940
Date: June 2025

1. Company Overview

Beparagon LLC is a U.S.-based telecommunications services provider delivering voice-over-IP (VoIP) solutions to a range of enterprise clients, including law firms, healthcare practices, accounting offices, and other professional service providers. We operate on an IP-based network and currently originate and terminate calls primarily using SIP (Session Initiation Protocol). Although our network is fully IP-based, STIR/SHAKEN implementation is not yet completed due to technical and operational factors.

In the interim, and in accordance with 47 CFR § 64.6305, Beparagon LLC has implemented a **comprehensive Robocall Mitigation Program** designed to prevent the origination of illegal robocalls, monitor all voice traffic patterns, and ensure responsible use of our voice services.

2. Robocall Mitigation Program Elements

Our program incorporates industry best practices and regulatory guidance from the FCC and Industry Traceback Group (ITG). It includes the following elements:

a. Know Your Customer (KYC) & Customer Onboarding

- All prospective customers are subject to a mandatory KYC process, which includes:
 - Legal business registration verification (EIN, state records, etc.)
 - Contact and business documentation checks
 - Website and domain validation
 - Traffic use case assessment
- We reject applications with unclear business models, non-traceable ownership, or traffic patterns historically associated with illegal robocalls.
- Existing customers are periodically revalidated to ensure their use remains compliant with our policies.

b. Real-Time and Post-Call Traffic Monitoring

- We employ internal traffic analytics tools and third-party call analytics services to:
 - Detect abnormal calling behavior (e.g., high-volume, short-duration calls)
 - Identify unusual patterns like repetitive sequential dialing or excessively high answer-to-seizure ratios
 - Monitor number reputation and flag numbers that show up on industry blacklists (e.g., Nomorobo, Hiya)
- High-risk traffic is automatically flagged for review, and suspicious call attempts may be blocked or rate-limited in real time.

c. Call Blocking, Filtering, and Rate Limiting

- Outbound calls from unknown or newly onboarded customers are subject to stricter scrutiny and volume limitations.
- We implement:
 - Per-hour/per-day call thresholds
 - Destination-based call rate controls
 - Rejection of calls with malformed or spoofed caller ID headers
- Calls matching robocall patterns (e.g., ringless voicemail, unsolicited telemarketing) are blocked proactively.

d. Cooperation with Traceback and Law Enforcement

- Beparagon LLC is an active and responsive participant in traceback efforts coordinated by the Industry Traceback Group (ITG).
- We:
 - Respond to traceback requests within required timeframes
 - Provide detailed call records when legally required
 - Take enforcement action, including suspension or termination, against customers found to originate unlawful robocalls

e. Ongoing Auditing and Compliance Checks

- Our internal team conducts:
 - Weekly reviews of flagged traffic and call detail records (CDRs)
 - Monthly audits of customer traffic trends
 - Ad hoc investigations when external complaints are received

- Customers may be re-screened or subjected to additional verification if their behavior changes or becomes suspicious.
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3. Enforcement and Policy Violations

- Our Terms of Service strictly prohibit:
 - Use of our platform for illegal robocalls
 - Call ID spoofing not in accordance with Truth in Caller ID Act
 - Transmission of deceptive or fraudulent traffic
 - Violations result in:
 - Immediate call blocking
 - Account suspension
 - Law enforcement reporting, when applicable
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4. STIR/SHAKEN Implementation Plan

Although not yet fully deployed, Beparagon LLC has a roadmap to implement STIR/SHAKEN in collaboration with our upstream carriers and equipment vendors. This includes:

- Upgrading core SIP infrastructure to support identity header insertion and verification
 - Establishing digital certificate signing with a trusted STI-CA
 - Target deployment date: [Insert date if known]
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5. Commitment to Consumer Protection

Beparagon LLC is committed to safeguarding the integrity of the public telephone network and reducing the harm caused by unlawful robocalls. Our robocall mitigation program will continue to evolve based on FCC guidance, industry practices, and technological improvements. We consider robocall prevention a critical aspect of our service mission.