

HURST SYSTEMS LLC

FCC Registration Number (FRN): 0037026929

Filing Type: Voice Service Provider – Partial STIR/SHAKEN Implementation

Certification Rule Cited: 47 CFR § 64.6304(e)

September 18, 2025

Hurst Systems LLC is a managed service provider (MSP) and VoIP reseller that offers voice services to end-user customers. We operate FreePBX-based systems for provisioning and managing PBX functionality for our clients. However, we do not originate calls directly to the PSTN through our own facilities. All outbound calls are routed exclusively through third-party SIP trunk providers who are STIR/SHAKEN compliant and perform call signing on our behalf.

As such, we do not have the technical capability to implement STIR/SHAKEN ourselves and qualify for the exemption under 47 CFR § 64.6304(e).

To comply with 47 CFR § 64.6305(a), we maintain a proactive robocall mitigation program which includes:

- 1. Customer Vetting**

All customers are identity-verified before activation. We perform manual review and require valid business registration or identification for new accounts.

- 2. Terms of Service Enforcement**

Customers agree to strict acceptable use policies that prohibit illegal robocalling and unsolicited mass calling activities.

- 3. Traffic Monitoring**

We monitor call traffic patterns for signs of suspicious behavior (e.g., short-duration bursts, high call-per-minute rates, invalid call

attempts). Irregular traffic is investigated and may result in account suspension.

4. Traceback Cooperation

We are fully committed to responding to traceback requests within 24 hours from the Industry Traceback Group (ITG), the FCC, or law enforcement.

5. Complaint Handling

We respond promptly to any complaints related to call abuse or robocalling and take appropriate mitigation actions, including termination of service if necessary.

6. No Direct PSTN Access

We do not maintain or operate our own switching facilities that interconnect with the public telephone network.

Our SIP trunking and call routing partners include:

- Voipinnovations, Flowroute
- All providers have publicly attested to full STIR/SHAKEN compliance and participate in the Robocall Mitigation Database.

Submitted by:

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Date: 6/18/2025