

Robocall Mitigation Plan

CHAMELEON SYSTEMS & SERVICES CORP (CS&SC)

1. STIR/SHAKEN Implementation Status

CHAMELEON SYSTEMS & SERVICES CORP (CS&SC) does not have control over the IP portions of the network required to implement STIR/SHAKEN and therefore qualifies for exemption under 47 CFR § 64.6304(d). CS&SC operates as a reseller, providing SIP-based PBX services to a small group of business customers using a softswitch. All outbound and inbound PSTN calls are routed through our upstream providers, who fully implement STIR/SHAKEN on our behalf. Our system does not have access to, nor operate, any interconnecting carrier infrastructure. Accordingly, CS&SC is not required to implement STIR/SHAKEN under current FCC rules.

2. Robocall Mitigation Measures

CS&SC takes the following reasonable steps to prevent the origination of illegal robocalls:

- We maintain Know-Your-Customer (KYC) practices, verifying customer identity and business details prior to account creation.
- All customers are manually provisioned and vetted before service activation.
- We prohibit auto-dialers, call centers, or high-volume calling applications.
- Caller IDs are assigned from verified DIDs obtained through our upstream provider.
- We monitor traffic patterns for anomalies including call spikes, short-duration calls, and failed call attempts.
- Our Terms of Service prohibit illegal robocalls and spoofing, with enforcement including suspension or termination.
- We follow Know-Your-Provider (KYP) practices by verifying and maintaining records on our upstream VoIP carrier(s), including their STIR/SHAKEN status.

3. Traceback and Enforcement Cooperation

CS&SC commits to respond to traceback requests from the FCC, law enforcement, and the Industry Traceback Group as promptly as possible. We cooperate fully in identifying and mitigating any suspicious or illegal call activity originating from our platform.

4. Point of Contact for Traceback Requests

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