



Robocall Mitigation Program Description

Business Name: Business Telco, LLC

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1. Business Overview

Business Telco, LLC is a U.S.-based wholesale VoIP provider, newly established to offer reliable and compliant voice termination and origination services. Our clients include VoIP resellers, call centers, and international carriers entering the U.S. market. We do not serve residential or enterprise end-users directly.

We are currently in the process of full regulatory compliance:

- We have applied for a **Form 499 Filer ID** with USAC.
- Once issued, we will immediately move forward with obtaining an **Operating Company Number (OCN)** from NECA.
- Following that, we will complete registration with **STI-PA** and secure our **STIR/SHAKEN certificate** to begin signing calls independently.

2. Robocall Mitigation Strategy

Although we do not originate end-user traffic, Business Telco, LLC takes illegal robocall prevention seriously and maintains a proactive mitigation program with the following key components:

2.1. Know Your Customer (KYC) and Onboarding

- Every reseller and wholesale customer must undergo strict verification before activation.



- We require and validate:
 - Business registration and incorporation documents.
 - 499 Filer ID and/or VAT ID (for non-U.S. entities).
 - Nature of traffic: retail, wholesale, call center, or CLI replacement services.
 - Contact information for a compliance officer or technical manager.

2.2. Traffic Monitoring & Anomaly Detection

We actively monitor VoIP traffic using tools that detect common robocall red flags:

- High-volume, short-duration traffic bursts.
- Rapid increases in call attempts with low Answer Seizure Ratios (ASR).
- Improper or invalid caller ID formatting.
- Traffic directed to known Do Not Originate (DNO) numbers.

Suspicious activity is reviewed by our compliance team in real time, and accounts may be suspended or permanently blocked if abuse is confirmed.

2.3. Real-Time Alerts and Reporting

Our system alerts for:

- ACD below 15 seconds across large volume
- Sudden shifts in call origination countries or prefixes
- Invalid NPA-NXX in caller IDs

Such alerts trigger immediate review and may result in temporary call blocking pending investigation.

3. Call Authentication / STIR/SHAKEN Plans

As of this filing, Business Telco, LLC is not yet authenticated to sign calls using STIR/SHAKEN due to the absence of an OCN and completed STI-PA registration. However, our compliance roadmap includes:



- Completing our 499 Filer ID assignment.
- Submitting our OCN application to NECA (in progress).
- Registering with the STI-PA portal and obtaining STIR/SHAKEN credentials.
- Signing outbound traffic under **Attestation B or A** depending on the call origination context.

Until our certificate is active, we work with upstream providers who are authorized STIR/SHAKEN signers and ensure that traffic from our network is signed at the next hop.

4. Traceback & Industry Cooperation

We fully support traceback efforts initiated by the **Industry Traceback Group (ITG)** and the **FCC Enforcement Bureau**. Business Telco, LLC has designated a point of contact to respond to all traceback requests within 24 hours.

Our team investigates each traceback immediately and takes necessary measures, including terminating abusive customers, blocking affected prefixes, and reporting upstream sources if needed.

5. Contracts and Acceptable Use

All customers must agree to our **Acceptable Use Policy (AUP)** which prohibits:

- Illegal robocalling and fraud
- Spoofing or masking CLI without legal justification
- Use of auto-dialers or robodialers for non-compliant traffic
- Calling numbers listed in the National Do Not Call Registry (unless authorized)

Violations may result in account termination, withheld balances, and reporting to regulatory authorities.

6. Exemption Justification



Under **47 CFR § 54.706(d)**, Business Telco, LLC qualifies for exemption from direct contribution to the **Universal Service Fund (USF)**, **TRS**, **NANPA**, and **LNP**. We operate exclusively as a **wholesale VoIP provider**, and our customers (resellers, CLECs, and service providers) are either contributors themselves or pass through the applicable charges to their end-users.

7. Robocall Mitigation Contact

All robocall mitigation inquiries and regulatory communications may be directed to:

Compliance Officer

Business Telco, LLC

 Email: compliance@businesstel.co

 Phone: 866-210-1366