

Robocall Mitigation Program ECN Pty Ltd

1. Company Overview

ECN Pty Ltd is a foreign voice service provider headquartered in Toowong, Queensland Australia. We operate a hosted CloudPBX platform that serves end users across multiple regions, including the United States. Our US telephone numbers are provisioned through wholesale partners such as DIDWW. We enable outbound and inbound voice communication via SIP trunks.

2. STIR/SHAKEN Status

We do not currently implement STIR/SHAKEN, as we are not a US-based provider and do not have access to the necessary IP-based interconnections or numbering resources within the US telephone network. As a foreign provider without a direct interconnect in the US, we qualify for the exemption outlined in 47 CFR § 64.6304(a)(1).

We rely on upstream partners who may apply STIR/SHAKEN to calls entering the US network. We are actively evaluating the feasibility of STIR/SHAKEN adoption in collaboration with these providers.

3. Robocall Mitigation Practices

We maintain a robust robocall mitigation program for all calls originating on our network:

- Know Your Customer (KYC): All customers are verified through manual onboarding. We require valid business identification and verify contact information before enabling international voice services.
- Usage Monitoring: We monitor call patterns in real time to identify signs of potential robocall activity, such as high calls-per-second (CPS), short-duration calls, and sequential dialling behaviour.
- Abuse Controls: Call behaviour thresholds are enforced at the SIP trunk level. If abuse or anomalous call patterns are detected, the trunk is rate-limited or disabled pending investigation.
- Traceback Cooperation: We will fully cooperate with traceback requests from the FCC, the Industry Traceback Group, and law enforcement. We commit to responding to all traceback requests within 24 hours.
- Restricted Access: Access to US number provisioning and outbound international calling is only available after KYC checks and approval by our provisioning team.

4. Contact for Traceback Requests

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