

Robocall Mitigation Plan - Callisphere LLC

Company: Callisphere LLC

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Robocall Mitigation Practices:

Callisphere LLC provides VoIP services to small and medium businesses, as well as school districts in South Dakota. We have not implemented the STIR/SHAKEN authentication framework on any portion of our network.

This is because Callisphere LLC relies on upstream intermediate providers (e.g., Flowroute, Voicetrade) to deliver outbound VoIP traffic, and therefore does not have the technical ability to directly sign calls with STIR/SHAKEN. Additionally, portions of our network may interconnect via non-IP infrastructure or through providers that do not support end-to-end STIR/SHAKEN authentication.

As required by 47 CFR § 64.6305(a), we have implemented the following robocall mitigation practices:

- Strict KYC onboarding for all customers
- Manual and automated traffic monitoring
- Call rate limits per account and per trunk

- Active cooperation with traceback requests (response within 24 hours)
- Verification and enforcement of valid Caller ID usage
- Blocking of high-risk or fraudulent call patterns
- Immediate suspension of accounts suspected of abuse

Callisphere LLC affirms its commitment to prevent the origination of illegal robocalls and to cooperate fully with law enforcement, the FCC, and the Industry Traceback Group.