

Company Name: Pablo & Co

FRN: 0037347580

Contact: 8087786009

RMD Status: No STIR/SHAKEN implementation

1. Overview

Pablo & Co is a VoIP-based telecommunications service provider that does not originate calls on its own facilities. As such, it has not implemented STIR/SHAKEN but is actively engaged in mitigating illegal robocall traffic through robust know-your-customer (KYC) procedures, traffic analysis, and proactive account management.

2. Robocall Mitigation Practices

While STIR/SHAKEN is not implemented due to our non-facilities-based status, Pablo & Co has adopted a multi-pronged robocall mitigation strategy which includes the following:

A. Know-Your-Customer (KYC) Vetting

- All new customers undergo identity verification and business validation.
- We require government-issued identification, proof of business registration (EIN, articles of incorporation), and a description of their intended use case.
- Accounts flagged for suspicious usage are immediately subject to manual review and potential suspension.

B. Traffic Monitoring & Call Pattern Analysis

- We monitor outbound traffic in real-time using automated systems that flag high-volume, short-duration, or sequential dialing patterns.
- Any anomalous or suspect calling patterns are escalated for review and, if needed, traffic is blocked pending investigation.

C. Outbound Call Restrictions

- By default, outbound international and high-risk destination calling is disabled unless explicitly requested and approved.
- We utilize rate limiting and call-per-minute thresholds on accounts as needed to prevent abuse.

D. Complaint and Feedback Loop

- We respond promptly to traceback requests from the Industry Traceback Group (ITG), law enforcement, or downstream providers.
 - Customers found to have originated illegal or unwanted robocalls are immediately terminated and reported as required.
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3. Traceback Compliance

Pablo & Co fully cooperates with the USTelecom Industry Traceback Group (ITG) and responds to all traceback requests in a timely manner. We maintain call records sufficient to assist with traceback investigations as required under FCC regulations.

4. Ongoing Monitoring & Updates

Our robocall mitigation program is reviewed quarterly. Adjustments are made based on evolving threat vectors, new regulatory guidance, and industry best practices.

5. Point of Contact

For robocall mitigation issues or traceback requests, please contact:

Felicisima Pablo : Robocall Compliance Officer

Email: felicisimapablo1@gmail.com

Phone: 8087786009