

Robocall Mitigation Program Description

Company Name: OTO9 TECHNOLOGIES LLC

FRN: 0037364908

Address: 10786 Indian Head Industrial Blvd, Saint Louis, MO 63132

OTO9 TECHNOLOGIES LLC certifies that it has fully implemented the STIR/SHAKEN framework across its entire network in accordance with 47 CFR § 64.6301(a)(1) and (2). All calls originated and carried on the network are subject to STIR/SHAKEN authentication and are compliant with the FCC's robocall mitigation requirements. As part of its robocall mitigation program, OTO9 TECHNOLOGIES LLC:

1. Digitally signs all outbound calls using STIR/SHAKEN protocols through authorized STI-CA certificates.
2. Ensures that all signaling equipment (e.g., SBCs and softswitches) are capable of inserting and verifying SIP Identity headers.
3. Monitors all voice traffic for patterns that may indicate unlawful robocall activity and uses automated systems to flag high-risk traffic.
4. Requires Know Your Customer (KYC) vetting procedures for all customers and resellers.
5. Maintains internal policies and processes to ensure customers do not originate illegal robocalls.
6. Responds fully to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group within 24 hours.
7. Maintains an internal compliance and operations team (NOC) to handle real-time traffic issues and traceback cooperation.

There are no principals, affiliates, subsidiaries, or parent companies to report. For more information, please contact: Rishi
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