

# Robocall Mitigation Program Description

Futurion Innovations LLC

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Filing Date: Aug 9, 2025

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## 1. Company Overview

Futurion Innovations LLC is a Texas-based interconnected VoIP provider delivering inbound and outbound calling services to residential, business, and wholesale clients across the United States. Our core network is SIP-based and powered by Kamailio for SIP routing and FreeSWITCH for media services and call control, with multiple upstream carrier interconnections for PSTN access.

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## 2. STIR/SHAKEN Implementation Status

At this time, Futurion Innovations LLC has not implemented STIR/SHAKEN in the IP portions of our network. We are preparing for STIR/SHAKEN deployment by coordinating with upstream carriers, upgrading SIP infrastructure for signing capability, and planning certificate authority integration. Until implementation is complete, we operate under the robust mitigation program below.

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## 3. Robocall Mitigation Practices (Technical & Procedural)

We employ a multi-layered mitigation strategy combining customer vetting, real-time analytics, call blocking, and manual review.

### 3.1 Customer Vetting – “Know Your Customer” (KYC)

**Identity Verification:** All customers (retail and wholesale) must provide government-issued ID or business registration.

**Service Address Validation:** Physical addresses are verified via postal databases.

**Payment Verification:** Services activate only after fraud-screened payment methods clear.

Wholesale Screening: Wholesale customers must provide an FCC registration number and attest compliance with call origination rules.

### 3.2 Real-Time SIP Traffic Analysis

Kamailio enforces edge policy and signaling controls; FreeSWITCH provides media-handling and per-session enforcement.

DNO Enforcement: Blocks calls to numbers on the FCC Do Not Originate list before egress.

Volume/Velocity Analytics: Detects spikes by endpoint/trunk/account; flags geographic “spray-and-pray” patterns across NPA-NXX.

Duration Profiling: Alerts on abnormal ratios of <15s calls.

Header & CLI Sanity: Validates From/PAI/Contact; rejects malformed or spoof-like CLI patterns; enforces E.164 normalization.

### 3.3 Call Blocking & Reputation Integration

Industry Reputation Feeds: Screen CLIs against third-party reputation APIs (e.g., TNS/Hiya equivalents) prior to routing.

Internal Watchlists: Daily-updated blacklists from traceback/abuse reports in Kamailio DB and mirrored in FreeSWITCH ACLs.

Dynamic Quarantine: Automatically diverts a suspect account’s traffic to a non-routable profile for review.

### 3.4 Rate Limiting & Throttling

Per-Endpoint/Trunk CPS: Kamailio enforces calls-per-second and concurrent call caps; FreeSWITCH limit module caps channels/dial attempts per realm, user, or IP.

Burst Controls: Excess bursts are 429’d/queued; thresholds raised only after manual review.

Campaign Guardrails: Higher throughput requires pre-approved use case and consent evidence.

### 3.5 Content & Consent Enforcement

TCPA Compliance: Autodialed/prerecorded marketing calls require documented prior express consent.

Campaign Pre-Approval: Scripts, samples, and consent records may be requested; we reserve the right to deny routing.

ANI Governance: Verified CLIs only; rotating/unassigned CLIs are prohibited.

### 3.6 Platform Hardening (Kamailio + FreeSWITCH)

ACLs & Auth: Source IP ACLs at Kamailio; FreeSWITCH acl.conf.xml for per-customer ingress; fail-close posture.

SIP Profiles: FreeSWITCH sofia profiles with strict TLS/SRTP for capable endpoints; topology hiding at Kamailio.

Concurrent/ASR Guards: Channel caps and ASR/ACD monitors trigger automatic traffic clamps and alerts.

Event Socket Monitoring: ESL-driven alarms on short-call bursts, 4xx/5xx spikes, or unusual re-INVITE patterns.

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## 4. Traceback & Enforcement Procedures

Futurion Innovations LLC participates in the Industry Traceback Group (ITG) and responds within one business day to traceback requests from the FCC, law enforcement, or industry peers.

Enforcement Steps:

1. Immediate Block: Suspend suspect traffic at Kamailio (and quarantine in FreeSWITCH if needed).
2. Customer Review: Require proof of call legitimacy/consent.
3. Termination: Permanently close accounts found in violation.
4. Escalation: Share evidence with ITG and relevant authorities.

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## 5. Cooperation & Record Retention

Maintain CDRs for at least 12 months for traceback.

Full cooperation with FCC/ITG/law enforcement inquiries.

Share intelligence on confirmed bad actors with peers where permitted by law.

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## 6. Certification Statement

I certify under penalty of perjury that the foregoing is true and correct, and that Futurion Innovations LLC has implemented the measures described above to prevent the origination of illegal robocalls on its network.



Daniel Carll (Aug 9, 2025 00:58:06 CDT)

Signed: \_\_\_\_\_

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Title: Chief Executive Officer

Date: Aug 9, 2025

**Signature:** 

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