

Callflow, LLC

Robocall Mitigation Plan

FCC Registration Number (FRN): 0037449915

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1. Introduction

Callflow, LLC provides VoIP services, including SIP trunking and hosted PBX solutions, to enterprise and wholesale customers. The Company is committed to protecting consumers and fully complying with the FCC's rules under 47 CFR §64.6305 to prevent unlawful robocalls. This Robocall Mitigation Plan outlines the technical and procedural safeguards Callflow has adopted for compliance.

2. STIR/SHAKEN Implementation

Callflow has implemented STIR/SHAKEN caller ID authentication on the IP portions of its network in partnership with its SBC vendor (Sansay) and Sansay's hosted STIR/SHAKEN signing service. All outbound calls are signed using valid STI certificates issued by an FCC-approved Certificate Authority. Calls are assigned appropriate attestation levels (A, B, or C) depending on our ability to validate the customer and the calling number.

3. Customer Vetting and Onboarding

Callflow conducts Know-Your-Customer (KYC) procedures prior to activating services. Verification includes legal business registration or personal identity validation, EIN or corporate documentation, review of intended calling use cases, and fraud/reputation checks. Customers with high-risk profiles, such as lead generators or predictive dialers, are subject to heightened scrutiny or denial of service.

4. Traffic Monitoring and Analytics

Callflow actively monitors traffic patterns for indicators of unlawful robocalls, including abnormal call completion rates, call duration anomalies, spikes in traffic, and excessive calls per second (CAPS). Automated alerts allow us to block or rate-limit suspicious traffic until reviewed by compliance staff.

5. Traceback Cooperation

Callflow cooperates fully with the Industry Traceback Group (ITG) and law enforcement. We commit to responding to traceback requests within 24 hours. Our compliance officer, listed above, monitors traceback requests and ensures timely responses.

6. Remediation Procedures

If Callflow identifies suspected unlawful robocall traffic, we immediately suspend or rate-limit the traffic, notify the customer, and investigate the source. Customers unable to demonstrate compliance are terminated and permanently barred from our network.

7. Affiliates and Subsidiaries

Callflow, LLC has no affiliates or subsidiaries providing voice services that require separate RMD certifications. Any future affiliates will be disclosed and certified as required.

8. Compliance Commitment

Callflow, LLC understands that failure to maintain compliance may result in removal from the Robocall Mitigation Database and mandatory blocking by downstream providers. We are fully committed to ongoing compliance, continuous monitoring, and cooperation with industry and government partners to prevent unlawful robocalls.