



Robocall Mitigation and STIR/SHAKEN Policy

Company Name: senapbx LLC

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Service Type: Interconnected VoIP Provider

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I. Introduction

senapbx LLC is committed to complying with Federal Communications Commission (FCC) requirements designed to combat unlawful robocalls and caller ID spoofing. As an Interconnected VoIP provider, senapbx LLC recognizes the threat that illegal robocalls pose to consumers and the telecommunications ecosystem. This policy describes the measures used by senapbx LLC to prevent the origination of unlawful calls, authenticate caller identification information, monitor traffic, respond to suspicious activity, and cooperate with traceback and law-enforcement requests.

The purpose of this policy is to document senapbx LLC's robocall mitigation and STIR/SHAKEN practices and to provide regulators, carriers, customers, and industry partners with a clear description of the company's compliance procedures.

II. Contact Information

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The Compliance Officer is responsible for implementing and maintaining this policy, responding to inquiries from the FCC, law enforcement agencies, carriers, and industry traceback organizations, and reviewing company practices as regulatory requirements evolve.

III. Robocall Mitigation and STIR/SHAKEN Status

senapbx LLC operates an IP-based interconnected VoIP network utilizing FusionPBX/FreeSWITCH technologies and interconnected telecommunications carriers for nationwide call origination and termination.

senapbx LLC has implemented the STIR/SHAKEN caller ID authentication framework on its IP-based network. The company has obtained its own Service Provider Code (SPC) token and STIR/SHAKEN digital certificate.

Outbound calls originated by senapbx LLC that are subject to STIR/SHAKEN authentication are authenticated using senapbx LLC's own STIR/SHAKEN certificate.

When a third-party carrier or service provider performs the technical signing function on behalf of senapbx LLC, such authentication is performed using senapbx LLC's STIR/SHAKEN credentials and certificate. senapbx LLC maintains responsibility for its originating traffic and for determining the appropriate attestation level.

All calls originated through the senapbx LLC network are subject to the company's robocall mitigation procedures. These procedures include customer identification and vetting, Know Your Customer (KYC) practices, traffic monitoring and analysis, enforcement of acceptable-use requirements, investigation and suspension of suspicious accounts, and cooperation with traceback requests.

senapbx LLC is committed to responding promptly to traceback requests from the FCC, law enforcement agencies, and the USTelecom Industry Traceback Group and to taking appropriate action when potentially unlawful traffic is identified.

IV. Robocall Mitigation Practices

1. Know Your Customer (KYC)

- All new customers undergo identity verification, including validation of business registration, tax identification, and corporate contact details.
- We perform reputational checks, including web presence, prior telecommunications activity, and review of potential regulatory history.
- Customers requesting high-volume or international calling are subject to enhanced due diligence before service is activated.

2. Traffic Monitoring and Analytics

- We continuously monitor traffic patterns for anomalies such as short-duration call bursts, rapid sequential dialing, or spikes in international traffic.
- Automated tools are used to identify suspicious call behavior, and flagged traffic is subject to manual review.
- Accounts exhibiting suspicious patterns may be immediately suspended while the traffic is investigated.

3. Terms of Service Enforcement

- Our Terms of Service prohibit unlawful, fraudulent, or spoofed calls, as well as activities that may enable or promote illegal robocalling.
- Customers are required to agree to these terms as part of the onboarding process.
- Violations of these terms result in immediate suspension and may result in permanent termination of service.

4. Traceback Cooperation

- senapbx LLC fully cooperates with the USTelecom Industry Traceback Group (ITG), the FCC, and law enforcement.
- We commit to responding promptly to traceback requests and provide all available records to assist with the identification of unlawful robocall sources.

5. Call Authentication

- All calls originated by senapbx LLC that are subject to STIR/SHAKEN authentication are authenticated using senapbx LLC's own STIR/SHAKEN certificate.
- senapbx LLC maintains its own STIR/SHAKEN credentials and is responsible for determining the appropriate attestation level for originated calls.

- Where a third-party provider performs the technical signing function, such signing is performed on behalf of senapbx LLC using senapbx LLC's STIR/SHAKEN certificate.

V. Incident Response

When suspicious or potentially unlawful robocall traffic is detected, senapbx LLC takes immediate action. Our incident response process includes the following steps:

- Initial detection and review of the traffic pattern.
- Verification using call detail records, signaling information, and customer account data.
- Immediate suspension of the account if the traffic cannot be explained as legitimate.
- Investigation of the customer use case and communication with the customer for clarification.
- Permanent termination of service if unlawful robocall activity is confirmed.
- Documentation of the incident, investigation, and outcome for regulatory compliance purposes.

This incident response framework ensures that unlawful robocall activity is swiftly identified, isolated, and eliminated.

VI. Continuous Improvement

senapbx LLC recognizes that robocall mitigation is a continually evolving responsibility. Our approach to continuous improvement includes:

- Annual review of this policy, with interim updates as regulatory requirements or industry best practices evolve.
- Adoption of new monitoring technologies and analytics to improve detection of suspicious traffic.
- Ongoing training of staff to recognize signs of robocall abuse and to respond in line with established procedures.
- Active participation in industry forums, working groups, and regulatory consultations related to robocall mitigation.

Through these efforts, senapbx LLC ensures that our robocall mitigation program remains up to date, effective, and aligned with FCC requirements.

VII. Certification and Review

This policy is maintained as part of senapbx LLC's robocall mitigation and STIR/SHAKEN compliance program. The company will review and revise the policy as necessary to ensure that it accurately reflects senapbx LLC's network operations and compliance practices.

senapbx LLC
Gordon Davis-Thompson, Owner / Compliance Officer
September 8, 2026