

Superior Eagle Communications

Robocall Mitigation Program Description

1. Company Role and Exemption

Superior Eagle Communications provides managed VoIP and cloud phone system services to business customers. We do not operate facilities-based interconnection to the PSTN. All numbering resources, call routing, and STIR/SHAKEN authentication are provided through our customers' chosen upstream SIP providers (e.g., Telnyx, Bandwidth, or other carriers of record). Because Superior Eagle does not control SIP interconnection, we have no STIR/SHAKEN implementation obligation under the FCC's Eighth Report and Order (FCC 24-120).

2. Robocall Mitigation Practices

Although we do not carry traffic directly into the PSTN, Superior Eagle Communications implements the following practices to prevent unlawful robocall activity on our platform:

- Know Your Customer (KYC): Verification of all business customers before service activation.
- Contractual Controls: Terms of Service prohibit unlawful robocalling, spoofing, or autodialing.
- Monitoring and Investigation: Platform activity is monitored for unusual usage patterns. Suspected abuse is investigated immediately.
- Cooperation: We cooperate with law enforcement and industry traceback initiatives (e.g., USTelecom ITG) when needed.
- Upstream Carrier Reliance: All STIR/SHAKEN authentication and numbering obligations are fulfilled by upstream SIP providers.

3. Certification Statement

Superior Eagle Communications certifies that it has not been the subject of any FCC, law enforcement, or regulatory enforcement action in the past two years related to robocalls, spoofing, or deficient filings. We affirm our compliance obligations under the FCC's Robocall Mitigation Database and confirm that we operate as a Voice Service Provider without a STIR/SHAKEN obligation.

4. Compliance Contact

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