

Robocall Mitigation Program

BlueCastle IT Solutions LLC

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1. Company Overview

BlueCastle IT Solutions LLC is an IT services provider and reseller of hosted VoIP services. We do not operate as a facilities-based voice service provider. We do not obtain numbering resources, originate, or terminate calls on the PSTN under our own interconnects. All PSTN interconnection and STIR/SHAKEN obligations are fulfilled by our upstream wholesale provider, which has certified compliance in the FCC's Robocall Mitigation Database.

2. Exemption Statement

Pursuant to 47 CFR § 64.6301(a), STIR/SHAKEN obligations apply to providers with the technical capability to implement the authentication framework on IP portions of their network. BlueCastle IT Solutions LLC does not operate its own SIP backbone or numbering resources and is therefore exempt from direct STIR/SHAKEN implementation requirements.

3. Robocall Mitigation Practices

Even though we are exempt from direct STIR/SHAKEN obligations, BlueCastle IT Solutions LLC maintains a robocall mitigation program consistent with 47 CFR § 64.6305(c):

- **Customer Vetting** – Verification of business legitimacy, identity, and contact information prior to activation.
 - **Traffic Monitoring** – Ongoing monitoring of call traffic to identify unusual usage patterns or potential illegal robocall campaigns.
 - **Abuse Response** – Immediate suspension of services found to be associated with suspected illegal robocall activity.
 - **Traceback Cooperation** – Full cooperation with the Commission, law enforcement, and the industry traceback consortium. All traceback requests are responded to within 24 hours.
 - **Upstream Reliance** – All calls are authenticated through our upstream wholesale provider's STIR/SHAKEN implementation.
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4. Compliance Commitment

BlueCastle IT Solutions LLC is committed to preventing the use of its services for illegal robocalling and to complying with all applicable FCC rules, including 47 CFR § 64.6305(c).