

Robocall Mitigation Program Description – Trailhead Networks

1. STIR/SHAKEN Implementation Status

Trailhead Networks has not implemented STIR/SHAKEN directly on its network because it does not control the SIP infrastructure required to do so. Instead, Trailhead Networks operates as a white-label provider under upstream carrier SkySwitch, which has implemented STIR/SHAKEN on its platforms.

SkySwitch applies:

- Attestation Level A for calls using SkySwitch-issued DIDs.
- Attestation Level B for BYOT (Bring Your Own Telecom) numbers.

2. Exemption Justification

Trailhead Networks qualifies for exemption under FCC 20-136, which states:

“A voice service provider that does not have control over the network infrastructure necessary to implement STIR/SHAKEN may be eligible for an exemption... This includes resellers and white-label providers that rely entirely on upstream providers to originate and terminate calls.”

Trailhead Networks relies exclusively on SkySwitch for call origination and termination and therefore cannot implement STIR/SHAKEN independently.

3. Mitigation Techniques

Although exempt from STIR/SHAKEN, Trailhead Networks maintains a robocall mitigation strategy:

Customer Vetting

Trailhead Networks vets customers prior to activation to ensure they are legitimate businesses.

Traceback Cooperation

Trailhead Networks cooperates with traceback requests from the FCC and industry traceback consortiums.

Upstream Monitoring

Trailhead Networks relies on its upstream provider, SkySwitch, to monitor and block illegal robocall traffic.

4. Role in Call Chain

Trailhead Networks acts as a reseller/white-label voice service provider. All calls originate from SkySwitch's infrastructure.

5. Contact Information

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6. Additional Information

Trailhead Networks is not subject to any FCC enforcement or investigation related to unlawful robocalling.

We are not a foreign voice service provider.

We are not claiming any other STIR/SHAKEN implementation extension.