

Untethered Networks, LLC – Robocall Mitigation Program

Untethered Networks, LLC, doing business as Untethered Technologies, is a registered Voice Service Provider that delivers VoIP services to business customers. We operate as a reseller through Viirtue, our wholesale partner, who maintains carrier relationships and implements STIR/SHAKEN on all calls. Untethered Networks does not maintain its own interconnection or carrier facilities; instead, we provision end users on Viirtue's platform and rely on their STIR/SHAKEN implementation to satisfy FCC robocall mitigation obligations.

Certification Statement

Untethered Networks, LLC (d/b/a Untethered Technologies) certifies as a Voice Service Provider without a direct STIR/SHAKEN implementation obligation, under the exemption that our upstream wholesale provider (Viirtue) manages all STIR/SHAKEN authentication and attestation on our behalf. We ensure that all calls originated or terminated for our end users are fully subject to Viirtue's deployed STIR/SHAKEN solution.

Robocall Mitigation Practices

- Untethered Networks provisions and manages business end users exclusively through Viirtue's carrier-grade VoIP platform, which has a complete STIR/SHAKEN implementation.
- All outbound and inbound calls for Untethered's customers pass through Viirtue's network, ensuring full attestation and verification.
- We do not onboard customers without verification through Viirtue's established Know Your Customer (KYC) and compliance process.
- We monitor customer activity and service usage via Viirtue's fraud monitoring and call analytics tools to detect and address suspicious call behavior.
- If suspicious or unlawful robocall activity is identified, Untethered Networks coordinates directly with Viirtue to suspend or terminate the offending customer accounts promptly.

Compliance with 47 CFR § 64.6305(d)(ii)-(iii)

As a Voice Service Provider, Untethered Networks affirms that it has robocall mitigation practices in place consistent with 47 CFR § 64.6305(d)(ii)-(iii). This includes ensuring that all calls we originate or deliver for our customers are subject to STIR/SHAKEN by Viirtue, and that we maintain processes to monitor and respond to illegal robocall activity.

Confidentiality Note

This filing is intended for submission in the FCC Robocall Mitigation Database. If required, Untethered Networks, LLC (d/b/a Untethered Technologies) can provide both confidential (unredacted) and non-confidential (redacted) versions of this program description as permitted under WC Docket No. 17-97.