

Robocall Mitigation Program

Sirius Networks LLC

Date: [09.11.2025]

1. Company Information

- **Company Name:** Sirius Networks LLC
 - **Headquarters:** Yerevan, Armenia
 - **Business Type:** International wholesale telecommunications provider (Voice and Messaging).
 - **FCC Registration Number (FRN):** 0037493368
 - **Contact for Robocall Mitigation & Traceback:**
 - Name: Gor Gharagebakyan
 - Title: Director
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2. STIR/SHAKEN Exemption Justification

Sirius Networks LLC is an **international wholesale carrier based outside the United States**. The company does not provide retail voice services directly to U.S. end-users and does not control NANP (North American Numbering Plan) resources.

Under **47 CFR § 64.6301(a)**, the obligation to fully implement the STIR/SHAKEN caller ID authentication framework applies only to providers that directly originate calls onto the U.S. PSTN and maintain SIP interconnections with U.S. end-users. As Sirius Networks operates solely as a **foreign wholesale provider**, it is exempt from this requirement.

Nevertheless, in compliance with **47 CFR § 64.6305(a)**, Sirius Networks has implemented a Robocall Mitigation Program, described below.

3. Robocall Mitigation Practices

We monitor traffic, vet customers, and respond within 24 hours to traceback requests

5. Certification

Sirius Networks certifies that all calls it originates are subject to the above-described robocall mitigation program, in accordance with **47 CFR § 64.6305(a)**.

Signed:

Gor Gharagebakyan

Director, Sirius Networks LLC