

Robocall Mitigation Program Description**Pacific Lightwave, A California Corporation**

41905 Boardwalk, Suite Q, Palm Desert CA 92211

FCC Identifiers

499 Filer ID: 833735

Operating Company Number (OCN): N/A

Contact Person for Robocall Mitigation

Name: Lorenzo Ballejos

Title: VOIP Support

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Provider Role in the Call Chain

Pacific Lightwave is a non-facilities-based small voice service provider. We do not operate our own

switching equipment or directly obtain numbering resources. Instead, we obtain services from Cordial,

which operates the voice switch and performs STIR/SHAKEN authentication for outbound calls. As

such, Pacific Lightwave serves as both an originating and terminating voice service provider for its

end-user customers, and does not act as an intermediate provider or gateway provider.

STIR/SHAKEN Implementation Status

Pacific Lightwave has not directly implemented STIR/SHAKEN because we do not control the switching

equipment necessary to do so. We rely on our upstream provider (Cordial) to perform STIR/SHAKEN

authentication. Accordingly, we file under Option 3: No STIR/SHAKEN Implementation pursuant to 47

C.F.R. § 64.6304(a)(2) (exemption for non-facilities-based small providers).

Robocall Mitigation Program (47 C.F.R. § 64.6305(a))

Upstream Provider-

Coredial

215-297-4400

support@skyswitch.com

751 Arbor Way Ste 150, Blue Bell, PA 19422

A. Customer Vetting (“Know Your Customer”)

- Verify all new and renewing customers using business registration, contact details, and billing

validation.

- Require terms of service prohibiting illegal robocalls, spoofing, or unlawful traffic.
- Review accounts showing suspicious activity (high call volume, short call durations, unusual patterns).

B. Monitoring and Analytics

- Monitor call patterns to detect anomalies consistent with unlawful robocall traffic.
- Investigate flagged traffic promptly, with suspension or termination of service when needed.

C. Cooperation with Tracebacks

- Commit to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, or the industry traceback consortium.

D. Enforcement Actions Against Bad Actors

- Immediately cut off customers found to originate illegal traffic.
- Report offending accounts to upstream provider Cordial and, where appropriate, to law enforcement.

Compliance Statement

Pacific Lightwave certifies that all calls it originates are subject to this robocall mitigation program. It has

not had its certification removed by Commission action and is not prohibited from filing in the Robocall

Mitigation Database. This plan demonstrates Pacific Lightwave's commitment to preventing illegal

robocalls and to cooperating fully with the FCC, law enforcement, and the industry traceback

consortium in compliance with the TRACED Act and 47 C.F.R. § 64.6305(a).

Signed:

Simon Bojkovsky, President

Date: 09/16/2025