

Robocall Mitigation Program Description

[VoipHeroes LLC]

FCC WC Docket No. 17-97 Compliance

1. Company Information

- **Legal Entity Name:** VoipHeroes LLC
 - **Doing Business As (DBA):** VoipHeroes
 - **FCC Registration Number (FRN):** 0037486610
 - **Contact for RMD filings:** [admin@voiphheroes.com]
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2. Role in Call Origination

[Voip Heroes] is a **white-label VoIP provider**. We do **not operate or control the network infrastructure necessary to implement STIR/SHAKEN**, nor do we hold numbering resources or maintain IP interconnections to the PSTN. All call origination and authentication is performed by our upstream, facilities-based carriers.

3. STIR/SHAKEN Implementation Status

- We **do not directly implement STIR/SHAKEN** because we lack the infrastructure required to generate and sign calls with authentication tokens.
 - Our upstream carriers, which originate our traffic onto the public switched telephone network (PSTN), are **responsible for implementing STIR/SHAKEN**.
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4. Robocall Mitigation Practices

Even though we are not directly responsible for STIR/SHAKEN implementation, we maintain a **robocall mitigation program** to prevent the origination of unlawful robocalls through our platform. Our practices include:

1. Know-Your-Customer (KYC) Procedures

- We require customer identification and verification at onboarding, including collection of valid business name, address, contact details, and where applicable, state business registration.

- We screen customers against available industry and regulatory databases to prevent provisioning for known bad actors.

2. Traffic Monitoring and Analytics

- We monitor call traffic patterns (e.g., short duration, high volume, high call attempts per minute) for indicators of unlawful robocalling.
- Suspicious activity is flagged and reviewed; customers may be suspended pending investigation.

3. Contractual Controls

- Our service agreements require customers to comply with all FCC and TCPA regulations.
- We reserve the right to suspend or terminate service for suspected unlawful robocalling.

4. Upstream Carrier Partnership

- We contract only with facilities-based carriers that certify STIR/SHAKEN implementation in the FCC's Robocall Mitigation Database.
- We periodically confirm that our carriers remain in good standing.

5. Complaint Handling

- We maintain a dedicated abuse reporting channel: abuse@voiphheroes.com