

Phreeli Company
16192 Coastal Highway
Lewes, DE 19958

Re: **Robocall Mitigation Program**

INTRODUCTION

Phreeli is a voice service provider without a STIR/SHAKEN implementation obligation.

The following Robocall Mitigation Program (“Program”) outlines Phreeli Company (“the Company”)’s reasonable and affirmative steps—otherwise known as the Reasonable Steps Mitigation Standard (“Standard”)—to avoid originating illegal traffic and submit a filing consistent with the Commission’s orders and requirements. “Pursuant to the Standard, a provider’s program is ‘sufficient if it includes detailed practices that can reasonably be expected to significantly reduce’ the carrying or processing (for intermediate providers) or origination (for voice service providers) of illegal robocalls.”¹

This Program details the Company’s specific practices to curtail illegal traffic to therefore meet the aforementioned standard.

STIR/SHAKEN IMPLEMENTATION / MITIGATION MEASURES

As of the date of this filing, the Company has not fully implemented STIR/SHAKEN on its network, consistent with one of the two FCC’s exceptions: “a lack of control over the network infrastructure necessary to implement STIR/SHAKEN.” Due to the Company’s reliance on its upstream carrier, MVNO Connect, LLC (“MVNO-C”), for network infrastructure. Currently, Phreeli is completely reliant on MVNO-C for all public switching capabilities, OCN-related telephone number provisioning, and call attestation capabilities. As a pure reseller, Phreeli does not have its own switching infrastructure, and is reliant on upstream carriers to maintain telecommunications capabilities and infrastructure. It also cannot currently incorporate tokenization attestation into its network.

Also, the Company’s payment processors Stripe and NowPayments have implemented strong measures to remain compliant with KYC measures. Both providers maintain

¹ *Federal Communications Commission, DA-24-73A1*, 39 FCC Rcd ____ (rel. Feb. __, 2024).

robust KYC/AML measures as detailed in their online policies. Among such measures are algorithmic and programmatic-based counterfraudulent measures.²

REQUIRED CONTRACTUAL CITATIONS

Furthermore, and consistent with “Know Your Upstream” carrier obligations, MVNO-C maintains robust contractual obligations to prevent illegal traffic on its network. MVNO-C’s anti-robocalling and fraud terms make clear that MVNO-C may suspend or terminate end-user accounts for illegal traffic or misuse of the network.

Similarly, the Company’s Terms of Service make clear (void of legalese) that misuse of its upstream carrier’s network is a breach of contract. The Terms of Service specify that spoofing, illegal traffic, robocalling, and other such illicit activities are unacceptable on Phreeli’s network.³ Given credible evidence, the Company will investigate any such activity and act accordingly.

MONITORING AND ANALYTICS

Phreeli plans to employ state of the art fraud utilizing its OSS/BSS system, Portaone. This includes “service usage monitoring”, where the system actively monitors for abnormalities associated with particular end-users accounts, including traffic designated to a particular irregular jurisdiction, prompting administrators to receive alerts. Furthermore, automatically programmed with this technology are “fraudulent profiles.” Profiles that match criteria specified by Phreeli are suspended immediately by the system and cannot transact on the network.⁴

24-HOUR COMMITMENT TO LAW ENFORCEMENT & TRACEBACK ASSISTANCE

The Company is committed to working with the Commission, law enforcement, and the industry traceback consortium to resolve any issues related to illegal trafficking on our network. The Company will work within 24-hours to relay a response to such agency or authority. We are committed to cooperate with all of the aforementioned agencies and take measures to stop such traffic as soon as is feasible.

² Stripe, “Know Your Customer Obligations,” Stripe Support (online), <https://support.stripe.com/questions/know-your-customer-obligations> (last visited Sept. 29, 2025); NOWPayments, “KYC/AML Procedure,” NOWPayments Help (online), <https://nowpayments.io/help/security/kyc-aml/kyc-aml-procedure> (last visited Sept. 29, 2025).

³ Phreeli would be more than happy to supply the Commission a copy, if necessary.

⁴ PortaOne, “Fraud Protection,” PortaOne Documentation (Feb. 27, 2025), <https://docs.portaone.com/docs/mr120-customer-fraud-protection> (last visited Sept. 29, 2025).

Please submit all traceback requests to the following company designee:

David Moo

regulatory@phreeli.com

(929) 447-2400

Phreeli Company

16192 Coastal Highway

Lewes, Delaware 19958, United States

STATEMENT REGARDING INVESTIGATIONS RELATED TO ILLEGAL TRAFFIC

Since Phreeli has yet to provide service, the Company and its leadership have never been subject to any formal investigations accompanied by findings concerning the facilitation of illicit traffic over its network.

PRINCIPAL INFORMATION

Board of Directors

Steven Gelmis

Nicholas Merrill

Louis Rossmann

Officers

Nicholas Merrill

Philip Weiss