

Local Citations Services LLC
Robocall Mitigation Program Description

1. Company Information

Legal Name: Local Citations Services LLC

FRN: 0037573821

Business Address: 110 16th St Ste 1460, Denver, CO 80202, United States

Robocall Mitigation Contact: Muhammad Aneel Aslam, Managing Member

Contact Email: admin@localcitationsservices.com

Contact Telephone: +1 213 658 1806

2. Regulatory Status and STIR/SHAKEN Exemption

Local Citations Services LLC provides interconnected VoIP services as a non-facilities-based voice service provider. The company does not operate its own IP network and does not yet possess an Operating Company Number (OCN) or the required SPC token to implement STIR/SHAKEN directly. All outbound calls are authenticated and signed by fully compliant upstream carriers.

Rule Exemption (47 CFR § 64.6304(a))

Local Citations Services LLC is exempt from implementing STIR/SHAKEN because it is a non-facilities-based VoIP provider without its own IP network and without an OCN. Therefore, the company qualifies for the exemption under 47 CFR § 64.6304(a), and STIR/SHAKEN cannot be implemented directly by the filer at this time.

3. Robocall Mitigation Practices (47 CFR § 64.6305(a))

The company has implemented a robocall mitigation program designed to take reasonable steps to avoid originating illegal robocall traffic and to prevent the use of its service by bad actors.

Key elements of this program include:

a. Customer Vetting

- All business customers must provide valid identification, including legal business name, address, and tax identification where applicable.
- Accounts are reviewed prior to activation to confirm legitimacy and alignment with lawful use of voice services.

b. Traffic Monitoring and Controls

- Call traffic is monitored for unusual patterns, such as very high call volumes, short-duration calls, or other indicators consistent with illegal robocalling campaigns.
- The company may suspend or terminate service where traffic patterns or complaints indicate potential illegal or abusive calling behavior.

c. Complaint Handling and Traceback Cooperation

- The company maintains an abuse and compliance contact at admin@localcitationsservices.com for receiving and addressing robocall or spoofing complaints.
- Local Citations Services LLC commits to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use its services.

d. Caller ID Practices

- The company requires customers to use only caller ID numbers that they are authorized to use.

- The company prohibits manipulation of caller ID information with the intent to defraud, cause harm, or wrongfully obtain anything of value.

4. Ongoing Review and Program Updates

Local Citations Services LLC will periodically review and, as necessary, update this robocall mitigation program to remain consistent with FCC rules and industry best practices. When the company obtains an OCN and the necessary credentials to implement STIR/SHAKEN directly, it will work toward deployment of STIR/SHAKEN on its network and update its Robocall Mitigation Database filing accordingly.

5. Certification

The undersigned certifies that the above-described robocall mitigation practices are accurate to the best of his knowledge and that Local Citations Services LLC has implemented a robocall mitigation program consistent with 47 CFR § 64.6305(a).

Muhammad Aneel Aslam
Managing Member, Local Citations Services LLC