

Robocall Mitigation Program Description

Company Name: Global Telecommunication

1. Overview

Global Telecommunication is a foreign voice service provider that does not operate a network within the United States and does not have access to U.S. numbering resources. All outbound calls are delivered through U.S.-based upstream carriers that are responsible for STIR/SHAKEN authentication. The company therefore qualifies for exemption under 47 CFR § 64.6304.

2. Mitigation Practices

Global Telecommunication employs strict policies to prevent illegal or fraudulent call traffic. All clients are verified through a compliance screening process. Calling campaigns are monitored for abnormal behavior, including high-volume short-duration calls, answer rate anomalies, and suspicious patterns. Any such activity triggers immediate review and potential suspension.

3. Call Monitoring and Traffic Controls

The company continuously monitors call traffic using upstream carrier tools and internal QA processes. Suspicious traffic is reported to the carrier for traceback when necessary. The company commits to responding fully to traceback requests from the FCC, law enforcement, and the industry traceback consortium within 24 hours.

4. Compliance and Enforcement

Clients must agree to terms prohibiting illegal robocalling and spoofing. Violations result in immediate account suspension and reporting to the upstream provider. Global Telecommunication ensures its staff is trained in compliance standards.

5. Exemption Statement

Under 47 CFR § 64.6304, Global Telecommunication is exempt from STIR/SHAKEN implementation requirements because it is a foreign provider without access to U.S. numbering resources. All calls are authenticated by the U.S.-based carrier that terminates or transits the traffic.

This mitigation program is accurate and reflects the company's procedures and obligations.