



To Whom it may concern

Re: FCC Robocall Mitigation Database Program Filing

Robocall Mitigation Program Description

In regards to Te Conectamos has been determined to be exempt due to our status as an exclusive VOIP reseller Under 47 CFR § 64.6301 the exemption is qualified by (a) Te Conectamos does not operate any IP-based voice network capable of originating SIP calls. Te Conectamos is a non-facilities-based voice service provider that resells VoIP services provided entirely by its upstream provider, SkySwitch. Te Conectamos does not operate a softswitch, SBC, SIP authentication system, or any other network elements required to generate, sign, or transmit VOIP headers. All SIP call origination, call routing, interconnection with the PSTN, and STIR/SHAKEN authentication are performed exclusively by SkySwitch on Te Conectamos' behalf.

Because Te Conectamos does not originate SIP calls on its own network, it cannot implement STIR/SHAKEN and therefore falls outside the scope of the requirement in 47 CFR § 64.6301(a). As required, Te Conectamos committed to a robocall mitigation program consistent with 47 CFR § 64.6305(a) and works with SkySwitch to respond to traceback requests within 24 hours.

Because we have no direct access to the VOIP and switched-network equipment, we have in place a procedure whereby any customer reported issues regarding robocalls are ticketed, and forwarded to our Skyswitch representatives for proper mitigation within the database. This procedure is same-day executed. All customer facing staff are part of this procedure.

Thank you for your attention

Tom Ross

CEO

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