



Robocall Mitigation Program Description – CST Group Inc.

1. STIR/SHAKEN Implementation Status

CST Group Inc. has not implemented STIR/SHAKEN directly on its network because it does not control the SIP infrastructure required to do so. Instead, CST Group Inc. operates as a white-label provider under upstream carrier SkySwitch, which has implemented STIR/SHAKEN on its platforms.

SkySwitch applies: - Attestation Level A for calls using SkySwitch-issued DIDs. - Attestation Level B for BYOT (Bring Your Own Telecom) numbers.

2. Exemption Justification

CST Group Inc. qualifies for exemption under FCC 20-136, which states: “A voice service provider that does not have control over the network infrastructure necessary to implement STIR/SHAKEN may be eligible for an exemption... This includes resellers and white-label providers that rely entirely on upstream providers to originate and terminate calls.” CST Group Inc. relies exclusively on SkySwitch for call origination and termination and therefore cannot implement STIR/SHAKEN independently.

3. Mitigation Techniques

Although exempt from STIR/SHAKEN, CST Group Inc. maintains a robocall mitigation strategy:

Customer Vetting - CST Group Inc. vets customers prior to activation to ensure they are legitimate businesses.

Traceback Cooperation - CST Group Inc. - cooperates with traceback requests from the FCC and industry traceback consortiums.

Upstream Monitoring – CST Group Inc. relies on its upstream provider, SkySwitch, to monitor and block illegal robocall traffic.

4. Role in Call Chain

CST Group Inc. acts as a reseller/white-label voice service provider. All calls originate from SkySwitch’s infrastructure.

5. Contact Information

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6. Additional Information

CST Group Inc. is not subject to any FCC enforcement or investigation related to unlawful robocalling. We are not a foreign voice service provider. We are not claiming any other STIR/SHAKEN implementation extension.