

Robocall Mitigation Program Description

Company Name: YOUTEL COMMUNICATIONS EOOD

Country: Bulgaria

FCC Filing Option: Option 3 - No STIR/SHAKEN Implementation

1. Robocall Mitigation Program Overview

Our company does not currently implement STIR/SHAKEN because we do not have access to U.S. numbering resources or the authority to obtain a Secure Telephone Identity Certification (SPC) token. We are a non-U.S.-based VoIP provider utilizing SIP, and we originate calls to the United States through upstream providers. As such, our network does not support the STIR/SHAKEN framework directly.

Despite not implementing STIR/SHAKEN, we have instituted a robust robocall mitigation program in accordance with 47 CFR § 64.6305(a).

2. Mitigation Measures and Traffic Monitoring

We certify that:

- All originated calls are subject to active robocall mitigation procedures.
- We take reasonable steps to avoid originating illegal robocall traffic, including:
 - * Customer vetting before service activation
 - * Monitoring call traffic patterns for suspicious activity
 - * Blocking or suspending accounts exhibiting potentially illegal robocall behavior
 - * Terminating customers that violate our terms of service or legal regulations
- We maintain call logs and analyze metrics to identify high-volume, short-duration, or high-failure calls.

3. Traceback Cooperation Commitment

We commit to:

- Responding fully and within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Group (ITG).
- Cooperating in identifying and mitigating the sources of illegal robocalls.

4. Reason for STIR/SHAKEN Exemption

Our company is exempt from implementing STIR/SHAKEN authentication under 47 CFR § 64.6304(b) because:

"Voice service providers that are incapable of obtaining an SPC token due to Governance Authority policy are exempt from the requirements of § 64.6301 until they are capable of obtaining an SPC token."

We are based in the Republic of Moldova and therefore cannot obtain an SPC token under the current policies of the STIR/SHAKEN Governance Authority, which limits eligibility to U.S.-based service providers with numbering authority in the U.S. North American Numbering Plan (NANP).

5. Conclusion

We affirm that we are taking all reasonable and lawful steps to prevent the origination of illegal robocalls, even in the absence of STIR/SHAKEN implementation. We are committed to cooperation with U.S. authorities and industry traceback efforts to combat robocalls.