

Robocall Mitigation Program Description (Redacted)

Company Overview

[REDACTED] operates as a non-facilities-based VoIP service provider. The company does not own numbering resources, does not hold an Operating Company Number (OCN), and relies on upstream carriers for call origination and termination.

STIR/SHAKEN Status

The filer does not implement STIR/SHAKEN directly. All outbound calls are transmitted using SIP trunks and telephone numbers provided by upstream carriers that have fully implemented STIR/SHAKEN authentication. The filer relies on these upstream carriers for call signing and verification in accordance with FCC rules.

Applicable Exemption

Pursuant to 47 CFR §64.6304(a) and §64.6304(d), the filer is exempt from implementing STIR/SHAKEN because it does not operate a facilities-based network, does not originate calls using its own numbering resources, and does not possess the technical ability to obtain STI certificates.

Robocall Mitigation Measures

The filer maintains a robocall mitigation program consistent with 47 CFR §64.6305(a), which includes: Customer vetting and due diligence prior to service activation Prohibition of illegal robocalling and spoofing activities Monitoring of outbound traffic patterns Immediate suspension of customers engaged in suspected illegal activity

Traceback Cooperation

The filer commits to responding fully within 24 hours to traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Group, and to cooperate in investigations of suspected illegal robocalling activity.

Recordkeeping

The filer maintains internal records related to customer onboarding, traffic monitoring, and mitigation actions and will provide such records upon lawful request.

Conclusion

This robocall mitigation program is actively enforced and reviewed to ensure ongoing compliance with all applicable FCC robocall mitigation requirements.