



www.swantel.net

3750 Gunn Hwy Ste 306 #E222 Tampa, FL 33618

Pursuant to 47 C.F.R. § 64.6305 Swantel LLC, submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Swantel LLC. (hereinafter also referred to as “company name abbreviation” or “the company”) has in place to mitigate illegal robocalls. The company may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

Swantel LLC is not an Affiliate, subsidiary or parent company of any company. The company has not ever been sold or acquired by another company .The role the company plays in the network is Voice Service Provider (End User) on its network. It is in the process of getting registered with the STI-PA and OCN. The Officers of the company are: [REDACTED]

Swantel LLC is judiciously working to prevent unlawful robocalls from originating on its network and in the meantime Swantel LLC. has implemented the following robocall mitigation plan to address unlawful robocall traffic.

Swantel LLC is judiciously working to prevent unlawful robocalls from originating on its network and has implemented the following robocall mitigation plan to address unlawful robocall traffic.

Automatic Number Identification Management: Swantel LLC shall block originating telephone numbers if identified based upon patterns of activity.

Proactive Blocking. Swantel LLC requests underlying carriers to block calls from phone numbers on Do-Not-Originate lists published by US Telecom and Neustar.

General Terms and Conditions. Swantel LLC prohibits customers from originating fraudulent calling using any fraudulent means, devices, or technologies. In fact, Swantel LLC’s end user Terms and Conditions permit Swantel LLC, without notice, to discontinue, block or suspend Services if necessary to prevent fraud, scams, tampering, schemes, false or invalid numbers. In short, Swantel LLC shall block or suspend the service of any customers originating unlawful robocalls through Swantel LLC.

Swantel LLC's RMP includes an increasing investment in resources over time to further strengthen adherence to compliance requirements by customers.

Acceptable Use Policy. Swantel LLC's Acceptable Use Policy ("AUP") also prohibits customers from utilizing the Service for any illegal, fraudulent, objectionable and/or unauthorized manner, reserving the sole and absolute right to deny, restrict or immediately suspend or terminate service if the use of the service by the customer, or anyone having access to or using the service, either violates the Swantel LLC AUP or includes unlawful conduct.

Underlying Network Provider. Swantel LLC works with underlying providers and supports the benefit of deploying systems to detect potential robocall activity relying upon statistics such as average call duration, ASR, and call count carrier/consumer reports. Swantel LLC's regulatory compliance counsel confirms that Swantel LLC's underlying carriers maintain compliance with fully implemented STIR/SHAKEN protocols through the date of this RMP.

Traffic Reports and Industry Information. Reports generated by Call Detail Record and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, may identify potential unlawful robocalling. Although no evidence exists suggesting Swantel LLC in any way originates illegal robocall campaigns, in any instance where unlawful calling is identified, Swantel LLC maintains contractual ability to take any action it deems necessary to eliminate the fraudulent activity.

Swantel LLC has enforceable terms of use and/or an acceptable use policy noted in its contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. The company has a vetting and review process for upstream providers, that is, providers that send the company voice traffic that it terminates or transits to other providers.

Swantel LLC confirms that the upstream providers have a certification in the Robocall Mitigation Database. The company will not accept voice traffic from an unregistered provider. The Company has been informed of the upstream providers "Know-Your-Customer" guidelines and have provided them with the necessary KYC documentation they've requested that the company completes.

Swantel LLC follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that the company has an authenticated relationship with the customer. The Company uses this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

Swantel LLC also validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. The Company uses this information to support the attestation level it assigns to calls that it originates for that customer.

Swantel LLC contractual provisions with customers prohibit them from initiating illegal robocalls. If the Company discovers a customer is initiating suspicious robocalls, it warns them to stop. If such traffic continues, then the Company terminates their service.

Swantel LLC requires that upstream providers have a reasonable Robocall Mitigation Plan, including a vetting process for their customers as well as their upstream providers, and that they use call analytics to identify suspicious traffic.

Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company uses a KYCs to confirm the following information for its customers:

Customer's identity
Customer's right to use the telephone number
presented on calls
Service Address
Credit History
Authentic and Legal Campaigns



When the customer is a business, Swantel LLC, also requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

Swantel LLC will comply fully with all conditions set forth in the FCC'S 2025 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Swantel LLC has designated an individual as a dedicated point of contact for addressing traceback requests. **RMD Contact is** [REDACTED]. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>. The Company will respond promptly to inquiries from the Industry Traceback Group (ITG) within 24 hours.

If a pattern of questionable activity is detected Swantel LLC will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Requests from the ITG must be submitted in writing and include the following information:

- Company Name:
- Company Address:
- Phone Number in Question:
- Requestor's Name:
- Requestor's Title:
- Requestor's phone number:
- Requestor's e-mail:



Swantel LLC will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated Robocall Mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls. The company will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. The company will cooperate fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls.

Requests from the valid agency must be submitted in writing and include the following information:

- Law Enforcement Agency Name:
- Agency Address:
- Requestor's Name:
- Requestor's Title:
- Requestor's phone number:
- Requestor's e-mail:



Swantel LLC performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. The Company has not had any agency action or investigation due to suspected unlawful robocalling or investigations.

Swantel LLC is not subject to any Commission, Law Enforcement, or Regulatory Agency Action or investigation due to suspected unlawful robocalling or spoofing.

Swantel LLC does not wish to publicize any private and/or classified information that has the potential to expose the Company to fraud and/or anti-competitive actions. Therefore, the Company will submit a redacted version for the public site and requests that the FCC keep the unredacted version CONFIDENTIAL.
