

Robocall Mitigation Program Description
Filed Pursuant to 47 CFR § 64.6305

Filing Entity:

Zero Shift Security, LLC
FRN: 0037777653
126 Spring Glen Dr
DeBary, FL 32713
United States of America

1. Overview

Zero Shift Security, LLC ("the Company") is a United States-based Voice Service Provider that offers VoIP and related voice communication services to business customers. The Company does not operate as a Gateway Provider or a Non-Gateway Intermediate Provider as defined in 47 CFR § 64.6300 and does not directly obtain North American Numbering Plan (NANP) numbering resources.

In accordance with 47 CFR § 64.6305(a), the Company has implemented a robocall mitigation program designed to prevent the origination of illegal robocall traffic on its network and to ensure cooperation with the Federal Communications Commission (FCC), law enforcement agencies, and the industry traceback consortium.

2. STIR/SHAKEN Implementation Status and Exemption

Pursuant to 47 CFR § 64.6301(f), the Company qualifies for an exemption from implementing the STIR/SHAKEN authentication framework because it does not obtain NANP numbering resources directly from the North American Numbering Plan Administrator or a Pooling Administrator and does not sign calls using its own Secure Telephone Identity (STI) certificates.

The Company relies on upstream carriers and service providers for call origination, numbering resources, and any applicable STIR/SHAKEN authentication. As a result, the Company has not implemented the STIR/SHAKEN authentication framework on any portion of its network.

3. Reasonable Steps to Prevent Illegal Robocalls

The Company employs reasonable and appropriate measures to prevent the origination of illegal robocall traffic, including customer vetting, acceptable use policies, traffic monitoring, and enforcement actions such as suspension or termination of service for violations.

4. Traceback Cooperation

The Company commits to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium, and to cooperate in investigations to stop illegal robocall activity.

5. Ongoing Compliance

The Company regularly reviews and updates its robocall mitigation practices to ensure ongoing compliance with FCC rules and guidance and maintains accurate certification in the Robocall Mitigation Database.

6. Certification

Zero Shift Security, LLC certifies that this Robocall Mitigation Program Description is accurate and complete and that the Company complies with 47 CFR § 64.6305.

Authorized Representative

David Newman
Managing Member
Zero Shift Security, LLC
12/23/2025