

ROBOCALL MITIGATION PLAN

FILER INFORMATION

Company Name: STARPHONE LLC

FRN: 0037491578

Address: 5830 E 2ND ST, STE 7000 #28148, Casper, WY 82609

Role: Voice Service Provider (Reseller / OTT Application)

1. NATURE OF SERVICE AND STIR/SHAKEN IMPLEMENTATION STATUS

STARPHONE LLC ("the Company") is a non-facilities-based Voice over Internet Protocol (VoIP) reseller and Over-the-Top (OTT) application provider. The Company does not own or operate the underlying network infrastructure, session border controllers (SBCs), or signaling equipment necessary to implement the STIR/SHAKEN caller ID authentication framework.

Accordingly, the Company has selected "No Implementation" for its STIR/SHAKEN status in the Robocall Mitigation Database. All voice traffic originated by the Company's customers is routed exclusively through our underlying upstream carrier, Telnyx, which is responsible for performing STIR/SHAKEN attestation and call signing on our behalf.

2. ROBOCALL MITIGATION PROGRAM

To prevent the origination of illegal robocalls, STARPHONE LLC has implemented the following mitigation measures:

A. Know Your Customer (KYC) and Vetting:

- Identity Verification: We require all users to provide a valid mobile phone number for verification via One-Time Password (OTP) during the account registration process.
- Account Screening: We screen user accounts for legitimacy. Any account flagged for suspicious registration patterns or invalid contact information is blocked from accessing voice services.

B. Traffic Monitoring and Analysis:

The Company actively monitors outbound traffic patterns to identify anomalies indicative of illegal robocalling, including but not limited to:

- High-volume bursts of calls in short timeframes.
- Short-duration calls (calls under 6 seconds).
- Low Average Seizure Ratios (ASR).

If such patterns are detected, the system triggers an alert for manual review.

C. Enforcement and Termination:

Upon detection of suspicious activity or receipt of a credible complaint, the Company takes immediate action to suspend the offending account. If an investigation confirms the violation of our Terms of Service regarding illegal robocalling, the account is permanently terminated, and the user is banned from the platform.

3. COMMITMENT TO TRACEBACK COOPERATION

STARPHONE LLC is fully committed to cooperating with the Federal Communications Commission (FCC), law enforcement agencies, and the Industry Traceback Group (ITG).

We have designated a specific point of contact in the Robocall Mitigation Database to respond to traceback requests. We commit to responding to all traceback requests fully and within 24 hours to assist in identifying the source of illegal traffic.

CERTIFICATION

I hereby certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge.

Signature: Linpei Shen

Name: Linpei Shen

Title: Owner / CEO

Date: December 27, 2025