

Robocall Mitigation Program (RMD Plan)

Company: AZIMOV LLC

RMD ID: Active FCC Filing

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1. STIR/SHAKEN Status – Complete Implementation

AZIMOV LLC has fully implemented the STIR/SHAKEN authentication framework across its entire originating network. All calls originated on the AZIMOV LLC network are authenticated in full compliance with 47 CFR § 64.6301(a)(1) and (2). STIR/SHAKEN signing is applied at the point of origination for all outbound traffic without exception.

2. Traffic Monitoring

Traffic is continuously monitored through near real-time systems and daily reviews utilizing:

- Call Detail Record (CDR) analysis including ASR, ACD, PDD, and short-duration ratios
- Call velocity and burst detection per account, ANI, and destination
- Dedicated abuse and NOC monitoring channels for complaint intake
- Automated alerts for high CPS, abnormal destination concentration, and pattern anomalies

3. Mitigation Actions

Upon identification of suspicious or illegal robocall activity, AZIMOV LLC immediately implements mitigation actions including:

- Immediate network-level blocking or throttling of affected traffic
- Suspension of customer accounts pending investigation
- Permanent termination of service upon confirmation of illegal activity
- Blocking of associated ANI ranges or destination prefixes
- Retention of call records and authentication logs for traceback and enforcement

4. KYC and Customer Vetting

AZIMOV LLC applies comprehensive Know Your Customer (KYC) procedures prior to service activation and on an ongoing basis, including verification of:

- Legal business formation documents
- EIN/FEIN and corporate identity
- Proof of address matching the legal entity
- Beneficial ownership and controlling party identification
- Verified operational, abuse, and billing contact information
- Trade references when applicable

5. Traceback Cooperation and 24-Hour Commitment

AZIMOV LLC commits to fully cooperating with the FCC, law enforcement agencies, and the industry traceback consortium and to responding to all traceback requests within twenty-four (24) hours of receipt. Internal escalation and compliance procedures are maintained to ensure timely and effective response.

6. Traffic Role:

The company primarily operates as an originating service provider for outbound voice traffic. Traffic is originated from the company's own platform and authenticated customers.

In certain cases, the company may also act as an intermediate provider when routing traffic between interconnected carriers.

The company does not accept anonymous or unverified third-party traffic.

STIR/SHAKEN Attestation Policy:

- A Attestation is applied when the caller is fully authenticated and the calling number ownership or authority is verified (company-owned DIDs or validated customer numbers).

- B Attestation is applied when the customer relationship is established, but full number ownership cannot be conclusively verified.

- C Attestation is applied only in limited cases where neither ownership nor full authentication can be confirmed, and such traffic is closely monitored.

Number Authority Verification:

Calling number authority is verified through DID inventory records, LOA documentation, carrier confirmation, or contractual assignment to the customer.

Unverified Number Handling:

If calling number authority cannot be verified, the number is blocked from CLI use, downgraded in attestation level, or the call is rejected, depending on destination requirements and partner policies.