

Novalera Robocall Mitigation Program (RMP) Overview

Purpose & Scope

Novalera implements a robocall mitigation program designed to prevent the origination, carriage, and termination of illegal robocalls, fulfill caller ID authentication obligations where applicable, and comply with FCC Robocall Mitigation Database (RMD) filing requirements.

[\[ecfr.gov\]](#), [\[fcc.gov\]](#)

Regulatory Basis

This program follows FCC rules under 47 C.F.R. 64.6301 (STIR/SHAKEN) and 64.6305 (Robocall Mitigation & RMD certification), as updated through 2026, along with the FCCs public guidance and compliance dates. [\[ecfr.gov\]](#), [\[ecfr.gov\]](#), [\[docs.fcc.gov\]](#)

1) Caller ID Authentication (STIR/SHAKEN)

- Where Novalera operates or manages IP based voice services, we ensure STIR/SHAKEN is fully implemented (directly or via an authorized third party signer) so that outbound SIP calls are signed and inbound SIP calls are verified, with Novalera retaining responsibility for attestation decisions and use of our own certificate. [\[ecfr.gov\]](#), [\[docs.fcc.gov\]](#)
- Implementation includes obtaining and managing the SPC token and STI certificate required to sign calls. [\[ecfr.gov\]](#), [\[docs.fcc.gov\]](#)

Result: Increased trust in caller ID, fewer spoofed calls, and compliance with caller ID authentication mandates. [\[ecfr.gov\]](#)

2) Robocall Mitigation Controls (When/Where STIR/SHAKEN Doesn't Apply)

- We operate a documented mitigation program that takes reasonable, effective steps to avoid originating illegal robocalls and to avoid carrying/processing such traffic across any portions of the network where caller ID authentication is not feasible. [\[ecfr.gov\]](#)
 - Core elements include traffic analytics, rate/volume anomaly detection, destination and pattern analysis, and policy based call blocking consistent with FCC rules on mitigation and call blocking. [\[federalregister.gov\]](#), [\[transnexus.com\]](#)
-

3) Know Your Customer (KYC) & Know Your Upstream (KYUP)

- Onboarding & renewal due diligence: We collect and validate business identity (legal name, formation jurisdiction, tax IDs), physical address, authorized contacts, calling use case, number ownership/authorization, and agree to use policies; we deny or restrict service when risk thresholds are exceeded. [\[commio.com\]](#), [\[transnexus.com\]](#)
- Upstream vetting: We maintain a Know Your Upstream program to verify that immediate upstream providers are legitimate and not known sources of illegal traffic, consistent with FCC expectations. [\[federalregister.gov\]](#)

- We monitor FCC enforcement trends (e.g., recent KYC enforcement actions) to ensure our procedures remain affirmative and effective. [\[hwglaw.com\]](https://www.hwglaw.com)
-

4) Traceback Cooperation & Rapid Response

- Novalera commits to respond to traceback requests within 24 hours and to fully cooperate with the FCC, law enforcement, and the registered Industry Traceback Group (USTelecom ITG) to identify and stop illegal traffic. [\[ecfr.gov\]](https://www.ecfr.gov), [\[fcc.gov\]](https://www.fcc.gov)
 - We maintain contacts and logging to ensure investigations are handled promptly and thoroughly via the secure traceback process. [\[docs.fcc.gov\]](https://docs.fcc.gov), [\[tracebacks.org\]](https://www.tracebacks.org)
-

5) Blocking Obligations & Enforcement Handling

- Upon FCC notice of illegal traffic, Novalera will immediately block the identified traffic and any substantially similar traffic, and, if we are not the originator, identify our upstream provider and take lawful steps to mitigate. [\[federalregister.gov\]](https://www.federalregister.gov)
 - If an upstream provider fails to comply with an FCC blocking order, Novalera will block all traffic from that provider as required. [\[federalregister.gov\]](https://www.federalregister.gov)
-

6) Robocall Mitigation Database (RMD) Filing & Eligibility Controls

- Novalera files and maintains an up to date RMD certification and mitigation plan; we accept traffic only from providers listed in the RMD by the applicable compliance dates, including foreign providers that deliver calls with U.S. NANP numbers. [\[docs.fcc.gov\]](https://docs.fcc.gov), [\[fcc.gov\]](https://www.fcc.gov)
 - We update CORES/RMD information within 10 business days of any change and acknowledge the FCCs base forfeiture policies for inaccurate or stale data. [\[wiley.law\]](https://www.wiley.law)
-

7) Analytics, Monitoring, and Exception Handling

- We use internal and/or third party call analytics to detect high risk campaigns (e.g., short duration bursts, high answer seizure ratio anomalies, suspicious caller ID usage), and we suspend, block, or rate limit traffic per policy. [\[transnexus.com\]](https://www.transnexus.com)
 - We keep records of alerts, investigations, and enforcement actions to demonstrate effectiveness and continuous improvement. [\[transnexus.com\]](https://www.transnexus.com)
-

8) Numbering & Attestation Governance

- We verify right to use for caller IDs and assign appropriate attestation levels (A/B/C); A is reserved for calls where identity and number authorization are verified, consistent with STIR/SHAKEN practices. [\[ecg.co\]](https://www.ecg.co)

9) Training & Awareness

- Personnel with provisioning, support, NOC, and compliance duties receive periodic training on KYC/KYUP, traceback, blocking requirements, attestation policy, and RMD responsibilities. [\[federalregister.gov\]](https://www.federalregister.gov)

10) Governance, Roles & Contacts

- Program Owner: Novalera Compliance (reports to CEO).
- Operational Leads: NOC/Voice Engineering (analytics, blocking), Service Delivery (onboarding/KYC), Legal/Compliance (RMD filing & audits).
- Traceback/RMD Contact: (Designate name/title/email/phone).
- We review this RMP at least annually and after any material FCC rule changes. [\[docs.fcc.gov\]](https://docs.fcc.gov)

11) Customer Responsibilities (as Applicable)

- Customers must only use caller IDs they are authorized to use, comply with TCPA and other telemarketing laws, and cooperate in any traceback; violations may result in suspension or termination under Novalera's AUP.