

ROBOCALL MITIGATION PROGRAM

1. Overview

Puppy Telephone Company of Seattle, LLC (d.b.a PupsTel) is a VoIP reseller that provides voice and fax services for a limited number of customers.

2. STIR/SHAKEN Implementation

All outbound customer calls are routed through our upstream provider(s) which provide STIR/SHAKEN call authentication. Customers are provided access to accounts which are only able to originate calls with the upstream provider using numbers assigned to their account.

As PupsTel does not originate calls into the telephone network nor have direct access to numbering plan resources, PupsTel is exempt from the STIR/SHAKEN implementation obligation under 47 CFR 64.6301(a).

3. Robocall Mitigation Practices

PupsTel has developed and implements a Robocall Mitigation Program in accordance with 47 CFR 64.6305(a). This program includes:

- Ensuring Know Your Customer checks are performed per 47 CFR 64.1200(n)(4) prior to any use of services, including but not limited to payment verification and phone number verification. PupsTel does not provide service to anonymous users.
- Verification of all upstream providers status as compliant with 47 CFR 64.6305.
- First-party monitoring of outgoing traffic for signs of abuse (high call volume, low average call duration, high channel usage per assigned number, etc.) and investigation of any anomalies or complaints.
- A commitment to respond to traceback requests from the FCC, law enforcement, or the industry traceback consortium within 24 hours. PupsTel will cooperate with these groups to investigate and stop any use of our service for illegal robocalls.
- Suspension or termination of any user found to be in violation of the Mitigation Program, including any violations found in cooperation with the FCC or other enforcement entities.

4. Compliance Statement

PupsTel is committed to operating in compliance with FCC rules and ensuring our service is not used to originate illegal robocalls.

5. Compliance Contact

The compliance contact for PupsTel is regulatory@pups.tel