

Robocall Mitigation Program

The filer is a hosted VoIP service provider that does not directly originate calls to the Public Switched Telephone Network (PSTN). All outbound calling services are provided through an upstream carrier, SkySwitch, which has fully implemented the STIR/SHAKEN authentication framework and performs call signing on outbound traffic.

Because the filer does not originate calls on its own network and does not have direct access to the PSTN, the filer is exempt from implementing STIR/SHAKEN pursuant to 47 CFR §64.6304(d) and §64.6305(a).

The filer maintains a robocall mitigation program that includes customer vetting procedures, acceptable use policies, monitoring of traffic for potential abuse, and prompt response to traceback requests from the FCC, law enforcement, or the industry traceback consortium within 24 hours. Customers found to be engaging in illegal robocalling or other abusive behavior are subject to immediate suspension or termination.

The filer relies on its upstream provider for STIR/SHA milling and complies with all applicable FCC robocall mitigation requirements.