

First Class Networks – Robocall Mitigation Program Description

Company Name: First Class Networks, Inc.

Service Role: Voice Service Provider, Non-Gateway Intermediate Provider (as applicable)

Purpose and Scope

First Class Networks maintains a comprehensive Robocall Mitigation Program designed to prevent, detect, and mitigate illegal robocalls and caller ID spoofing in compliance with 47 CFR § 64.6305. This program applies to all voice traffic transmitted, originated, or terminated on networks managed or supported by First Class Networks.

STIR/SHAKEN Implementation

First Class Networks ensures that all SIP-based voice traffic originating on its network is authenticated using the STIR/SHAKEN framework where technically feasible. For traffic that cannot be authenticated due to legacy technology or other limitations, compensating mitigation controls are implemented.

Robocall Mitigation Practices

The company employs a layered approach to robocall mitigation, including traffic monitoring, reputation-based call analytics, call pattern analysis, rate limiting, and customer vetting. Suspicious call behavior, including high-volume short-duration calls, invalid caller ID usage, or known scam signatures, is flagged for investigation and remediation.

Response to Identified Threats

Upon detection of suspected illegal robocall activity, First Class Networks takes prompt action which may include traffic blocking, call labeling, service suspension, customer notification, and escalation to upstream carriers or regulatory authorities as appropriate.

Gateway and Intermediate Provider Controls

For traffic received from upstream or downstream providers, First Class Networks applies call validation, analytics screening, and traceback cooperation. The company participates in industry traceback efforts when required and responds promptly to traceback requests.

Recordkeeping and Compliance

First Class Networks maintains documentation of robocall mitigation efforts, investigations, and enforcement actions. Records are retained in accordance with FCC requirements and made available upon request.

Ongoing Review and Updates

This Robocall Mitigation Program is reviewed regularly and updated to address evolving threats, regulatory changes, and industry best practices.

Contact Information

Robocall Mitigation Contact: craig@firstclassnetworks.com

Phone: 617-209-4499

Company Address: First Class Networks, 500 W Cummings Park Suite 4000, Woburn, MA 01801

Executive Certification

I, the undersigned executive officer of First Class Networks, Inc., certify under penalty of perjury that the foregoing Robocall Mitigation Program is accurate and complete, that the practices described herein are implemented and enforced in good faith, and that First Class Networks is taking reasonable steps to prevent the origination and transmission of illegal robocalls on its network in compliance with 47 CFR § 64.6305 and all applicable FCC rules and guidance.

Name: Craig Rabe

Title: President

Company: First Class Networks, Inc.

Signature: 

Date: 2/3/2026