

ROBOCALL MITIGATION PROGRAM DESCRIPTION

ChatterBox Phone, LLC

Date: February 9, 2026

1. PROVIDER IDENTIFICATION AND SERVICE DESCRIPTION

ChatterBox Phone, LLC is a voice service provider offering residential VoIP landline service to families in the United States. The service is specifically designed as a parental-control phone system for households with children, providing safe communication capabilities without smartphone-related risks.

The service architecture incorporates inherent technical controls that prevent robocall origination:

- **Contact Whitelist Enforcement:** Outbound calls are restricted to a parent-approved contact list configured by the account holder. Calls to numbers not on the approved whitelist are blocked at the network level before reaching the PSTN, with the sole exception of emergency services (911).
- **Limited Concurrent Calls:** Each residential account is limited to a maximum number of simultaneous calls, making high-volume robocall campaigns technically impossible.
- **No Auto-Dialer Capability:** The service does not support auto-dialers, predictive dialers, or any automated calling equipment. Calls must be manually initiated from provider-supplied telephone handsets.
- **Provider-Assigned Caller ID:** Caller ID values are assigned by ChatterBox Phone and locked to verified customer telephone numbers. Customers cannot modify or spoof their outbound caller ID.
- **Residential-Only Service:** Service is restricted to residential family use. Commercial, marketing, telemarketing, and high-volume use cases are prohibited under the Terms of Service.

2. STIR/SHAKEN IMPLEMENTATION STATUS AND EXEMPTION BASIS

2.1 Current Implementation Status

ChatterBox Phone has not implemented the STIR/SHAKEN authentication framework on any portion of its network as of the date of this filing. See Section 2.3 for the planned path future implementation.

ChatterBox Phone lacks control over the network infrastructure necessary to implement STIR/SHAKEN for the following specific reasons:

- ChatterBox Phone does not hold telephone numbers directly from a numbering administrator (NANPA or the National Pooling Administrator). All telephone numbers are obtained through an upstream wholesale carrier.
- ChatterBox Phone does not possess the credentials necessary to obtain a STIR/SHAKEN certificate from an STI Certification Authority (STI-CA). Specifically, the

provider does not have direct number authority required to obtain an SPC Token from the STI Governance Authority (STI-GA).

- The upstream carrier's STI-AS (Authentication Service) requires the provider to supply its own STIR/SHAKEN private key and certificate, which ChatterBox Phone cannot obtain currently.
- ChatterBox Phone has no control over the Session Border Controllers (SBCs), softswitches, or other network infrastructure at the upstream carrier level where STIR/SHAKEN signing would need to occur.

2.2 Path to Future Implementation

ChatterBox Phone is actively pursuing STIR/SHAKEN implementation through the following steps:

- Application for an Operating Company Number (OCN) from NECA (currently in process)
- Upon obtaining an OCN, application for an SPC Token from the STI-GA
- Upon obtaining an SPC Token, acquisition of a STIR/SHAKEN certificate from an approved STI-CA
- Implementation of call signing infrastructure

The provider will update this certification within ten (10) business days of implementing STIR/SHAKEN on any portion of its network.

3. KNOW YOUR CUSTOMER (KYC) PROCEDURES

ChatterBox Phone implements the following affirmative, effective measures to know its customers and prevent illegal call origination:

3.1 Customer Onboarding Verification

All new customers must complete a verified onboarding process that includes:

- **Identity Verification:** Collection and verification of customer's full legal name and residential service address
- **Payment Verification:** Valid payment method (credit card or bank account) linked to a verified identity. Payment processor performs address verification (AVS) on all transactions.
- **E911 Registration:** Verified service address registered with E911 database, confirming physical location of service
- **Contact Information:** Valid email address and contact phone number for account communications

3.2 Service Restrictions

The following restrictions are enforced to prevent misuse:

- Service is available only to residential customers; commercial accounts are not permitted

- Each account is limited to provider-supplied telephone handsets; SIP credentials are not provided to customers for use with third-party equipment
- Outbound calling is restricted to the customer's pre-approved contact whitelist
- Maximum number of concurrent calls per account, based on n+2 number of extensions on the account.

3.3 Ongoing Customer Verification

Customer information is reverified when:

- Service address changes are requested
- Payment method is updated
- Unusual account activity is detected

4. CALL MONITORING AND ANALYTICS

4.1 Call Detail Record (CDR) Monitoring

ChatterBox Phone maintains comprehensive Call Detail Records for all calls originated on its network. CDRs include:

- Timestamp of call initiation and completion
- Originating device identifier and account
- Destination telephone number
- Call duration and disposition
- Caller ID transmitted

4.2 Traffic Analysis Procedures

The provider reviews call traffic for anomalous patterns on a weekly basis. Metrics monitored include:

- Call volumes exceeding 50 calls per day per line (flagged for investigation)
- Answer rates below 20% (potential indicator of unwanted calling)
- Average call durations under 10 seconds (potential indicator of robocall behavior)
- Calls to sequential telephone numbers
- Attempts to call numbers not on the approved whitelist (logged and reviewed)

4.3 Automated Technical Controls

The following technical controls operate automatically to prevent illegal call origination:

- **Whitelist Enforcement:** Calls to non-whitelisted numbers (except 911) are blocked in real-time before reaching the PSTN

- **Concurrent Call Limiting:** Simultaneous call attempts above the number plus two of registered extensions are rejected, and there is a low maximum number of extensions allowed per household (4 or less)
- **Caller ID Enforcement:** Outbound caller ID is set by the system; customer-provided caller ID values are not accepted

4.4 Third-Party Analytics

ChatterBox Phone does not currently utilize third-party robocall analytics vendors. Given the inherent technical limitations of the service (whitelist-only calling, two-call concurrent limit, residential-only customers), ChatterBox Phone believes that internal CDR monitoring is sufficient for the current subscriber base. The provider will evaluate third-party analytics solutions as the subscriber base grows.

5. TRACEBACK COOPERATION COMMITMENT

ChatterBox Phone commits to responding fully to all traceback requests within twenty-four (24) hours of receipt. This commitment applies to requests from:

- The Federal Communications Commission
- Federal, state, and local law enforcement agencies

6. CONTRACTUAL PROTECTIONS AND ENFORCEMENT

6.1 Terms of Service Provisions

The ChatterBox Phone Terms of Service include the following provisions related to illegal call prevention:

- Prohibition on originating autodialed calls, prerecorded voice messages, or artificial voice messages
- Prohibition on caller ID spoofing or transmitting misleading caller identification information
- Prohibition on using the service for telemarketing, commercial solicitation, or any non-residential purpose
- Requirement to cooperate with provider investigations into potential illegal call activity
- Acknowledgment that violation may result in immediate service termination without refund

6.2 Enforcement Procedures

When potential illegal call activity is identified, ChatterBox Phone will:

- Immediately suspend outbound calling capability for the account pending investigation
- Contact the account holder to investigate the activity
- Terminate service permanently if illegal activity is confirmed

- Report confirmed illegal activity to relevant authorities as required
- Retain all records related to the terminated account for potential law enforcement use

7. UPSTREAM PROVIDER INFORMATION

ChatterBox Phone originates calls to the PSTN through the following upstream carrier:

Carrier Name: BulkVS (Bulk Solutions, Inc.)

RMD Status: Listed in FCC Robocall Mitigation Database

STIR/SHAKEN: Implements STIR/SHAKEN authentication

8. OPERATING COMPANY NUMBER (OCN) STATUS

ChatterBox Phone does not currently hold an Operating Company Number (OCN). The provider is actively pursuing OCN registration with NECA (National Exchange Carrier Association) to enable future STIR/SHAKEN implementation capability.

This certification will be updated within ten (10) business days of obtaining an OCN.

9. DECLARATION

ChatterBox Phone LLC has not, nor has it ever been subject to any FCC Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

For any questions regarding ChatterBox Phone's Robocall Mitigation Plan, please contact:

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