

ITSTL

Robocall Mitigation Program

FCC Robocall Mitigation Database Filing

Legal Name: ITSTL

Business Address: 10 Fenton Plaza, Suite 1665, Fenton, MO 63026

Compliance Contact: compliance@itstl.com

1. Overview

ITSTL is a managed service provider offering voice and SMS services to its business clients. ITSTL relies on its upstream platform provider, SkySwitch, for STIR/SHAKEN authentication implementation and does not control the underlying SIP network infrastructure.

2. STIR/SHAKEN Implementation Status

ITSTL does not independently implement STIR/SHAKEN authentication. Authentication is performed by its upstream provider. ITSTL files as a voice service provider without a STIR/SHAKEN implementation obligation and maintains a robocall mitigation program consistent with 47 CFR § 64.6305.

3. Customer Vetting Procedures

- Services are provided only to established managed services clients
 - Business identity and authorized signers are verified
 - Caller ID use is restricted to assigned or authorized numbers
 - Robocalling, spoofing, and illegal traffic are prohibited by contract
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4. Traffic Monitoring & Mitigation Controls

- Monitoring of outbound call behavior using upstream analytics
- Investigation of abnormal traffic patterns
- Call rate and concurrency controls
- Immediate suspension of suspected abusive traffic

5. Complaint & Traceback Response

- Dedicated compliance email: compliance@itstl.com
- Commitment to respond to traceback requests within 24 hours
- Cooperation with the FCC, law enforcement, and traceback consortium

6. Enforcement & Termination

ITSTL will suspend or terminate service for customers engaging in illegal robocalling or spoofing and will preserve relevant records for investigation.

7. Record Retention

ITSTL maintains sufficient customer and call detail records to identify traffic sources and support traceback investigations.

Certification:

ITSTL certifies that this mitigation program is accurate and enforced in the ordinary course of business.