



Robocall Mitigation Program Description

Company Name: [REDACTED]

Service Type: Non-Facilities-Based VoIP Reseller

Upstream Carrier: voip.ms

[REDACTED] is a non-facilities-based VoIP reseller that originates outbound IP voice traffic for established business customers. [REDACTED] does not operate transmission facilities and relies on its upstream carrier, voip.ms, for network transport and STIR/SHAKEN implementation.

[REDACTED] does not directly sign calls with STIR/SHAKEN certificates. STIR/SHAKEN authentication is implemented by its upstream carrier in compliance with FCC requirements.

Because [REDACTED] originates traffic, it maintains an active robocall mitigation program that includes:

- Business identity verification prior to enabling outbound service
- Collection of customer business information and intended call use case
- Prohibition of illegal robocalls, caller ID spoofing, and TCPA violations
- Monitoring for abnormal traffic patterns (volume spikes, short-duration calls, high answer-seizure ratios)
- Per-account rate limits and concurrent call limits
- Immediate suspension or termination of suspicious or unlawful activity

[REDACTED] maintains call detail records (CDRs) and cooperates fully with traceback requests from the FCC, USTelecom Industry Traceback Group, law enforcement, and upstream carriers.

[REDACTED] Terms of Service prohibit violations of the Telephone Consumer Protection Act (47 U.S.C. § 227), 47 CFR § 64.1200, and the TRACED Act.

This robocall mitigation program is reviewed periodically and updated as necessary to maintain compliance with FCC regulations.