



ROBOCALL MITIGATION PROGRAM DESCRIPTION

Company: JSantos Technology LLC

DBA: JSantos Tech / JSantos Technology

Date: January 15, 2026

1. Service Overview

JSantos Technology provides voice services to end-users as a reseller utilizing SkySwitch origination/termination and SkySwitch-assigned telephone numbers (DIDs) for customers located in Puerto Rico and the United States. Calls originating from the SkySwitch network using SkySwitch-purchased DIDs are authenticated using the STIR/SHAKEN framework by the upstream provider (SkySwitch). When the outbound Caller ID is a SkySwitch-purchased DID, SkySwitch typically applies Attestation A. JSantos Technology does not operate its own STIR/SHAKEN signing infrastructure; authentication is performed by the upstream provider for calls originated using SkySwitch DIDs.

2. Robocall Mitigation Measures

JSantos Technology maintains affirmative, effective measures to reduce the risk of originating illegal robocall traffic:

- **Customer Vetting (KYC):** Validate business customers prior to activation, including legal name, address, responsible contact, and business documentation as applicable.
- **Controlled Activation:** Apply reasonable onboarding controls and initial limits for new accounts; increase capacity based on validated business need and usage history.
- **Monitoring & Analytics:** Review call detail records (CDRs) and operational metrics for suspicious patterns (unusual volume spikes, repetitive destination patterns, high call attempt rates, or other behavior consistent with unlawful robocalling).
- **Investigation:** Promptly investigate alerts, complaints, or indicators of suspicious calling behavior.
- **Corrective Action:** Take appropriate actions including warning, throttling, temporary restrictions, disabling users/extensions, disabling DIDs, blocking outbound calling, suspension, and termination for confirmed or repeated violations.

3. Traceback Cooperation and Response Commitment

JSantos Technology commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with these entities in investigating and stopping illegal robocallers that may attempt to use its service.

4. Alignment with Upstream Provider Policies

Because service is delivered over the SkySwitch platform/network, JSantos Technology aligns its operational controls with upstream robocall mitigation practices for traffic carried on that network. Where upstream monitoring identifies invalid or suspicious traffic, JSantos Technology will work with SkySwitch and the affected customer to investigate and remediate.

5. Contacts

Role	Name/Title	Email
Legal Contact	Jonathan Santos	jsr@jsantostech.com
Robocall/Abuse Contact	Support Desk	abuse@jsantostech.com

6. Review and Updates

This robocall mitigation program is reviewed periodically and updated as needed to reflect operational changes, upstream policy updates, and evolving regulatory requirements.