

Gargoyle Technologies, Inc. d/b/a Volo.net Internet+Tech

Robocall Mitigation Program

(STIR/SHAKEN Non-Implementation Filing)

Filing Category:

Option 3: No STIR/SHAKEN Implementation

Date:

January 2026

1. Provider Overview

Gargoyle Technologies, Inc. d/b/a Volo.net Internet+Tech (“Volo”) is a voice service provider that offers outbound voice services using upstream carrier partners for call termination. Volo does not currently perform STIR/SHAKEN call authentication on its own network. Instead, Volo’s upstream carrier signs outbound calls using its own certificates.

Under FCC rules, upstream signing does not count as STIR/SHAKEN implementation for the originating provider. As a result, Volo is filing under the category “No STIR/SHAKEN Implementation” and submitting this Robocall Mitigation Program as required under 47 CFR 64.6305.

2. Legal Basis for This Filing

There is no exemption rule that applies.

Under **47 CFR 64.6305**, any voice service provider that does not implement STIR/SHAKEN must:

- Maintain and follow a Robocall Mitigation Program, and
- File the program in the FCC Robocall Mitigation Database.

Since Volo does not perform its own STIR/SHAKEN signing, this mitigation filing is required and appropriate.

3. Summary of Robocall Mitigation Practices

Volo maintains a set of operational, technical, and verification controls designed to prevent the origination of illegal robocalls.

3.1. Customer Vetting and Verification

Volo requires the following from all customers before activating outbound calling services:

- Verification of identity
- Matching of corporate name, address, and contact details (for corporate customers)
- Confirmation of authority to use the phone numbers associated with the account
- Validation of source IPs and trunking configuration
- Review of intended traffic type and use case

Volo does not activate service until all verification steps are complete.

3.2. Call Traffic Monitoring

Volo continually monitors customer traffic for indications of unlawful or suspicious calling patterns, including:

- High call volume bursts
- Short-duration call patterns
- Known scam patterns
- Calls to invalid, unassigned, or high-risk numbers

Volo also responds to traceback requests within 24 hours, as required by 47 CFR 64.6305.

3.3. Prompt Response to Tracebacks and Enforcement Requests

Volo cooperates fully with:

- The Industry Traceback Group (ITG)
- The FCC Enforcement Bureau
- Federal and state law enforcement

Volo acknowledges all traceback requests within 24 hours and provides all required information promptly.

3.4. Anti-Robocall Account Controls

If Volo identifies suspicious traffic, Volo may:

- Suspend or throttle outbound calling
- Block specific destinations or call types

- Require additional customer verification
- Terminate service for confirmed abusive traffic

4. Plan for Future STIR/SHAKEN Implementation

Volo is actively taking steps to adopt STIR/SHAKEN:

1. **Obtaining its own Service Provider Code (SPC) token**
Volo is in the process of securing the credentials required to sign calls under its own identity.
2. **Integrate with upstream partner STIR/SHAKEN signing APIs**
Volo plans to implement systems to integrate its call initiation with upstream partner STIR/SHAKEN signing APIs to authenticate outbound calls using Volo's own SPC token.
3. **Migration from upstream signing to Volo's own signing**
Once the above steps are complete, Volo will shift all call authentication processes away from upstream carriers and perform its own full STIR/SHAKEN implementation, and update the RMD.

These steps demonstrate Volo's active efforts to achieve full STIR/SHAKEN compliance as soon as practical.

5. Compliance Contact Information

Robocall Mitigation Contact:

[REDACTED]
[REDACTED]
[REDACTED]

Technical Contact:

[REDACTED]
[REDACTED]

Regulatory Compliance Contact:

[REDACTED]
[REDACTED]