

Robocall Mitigation Program Description

Bell South Tech Technologies LLC is an interconnected VoIP service provider offering hosted voice services to business and residential end-users in the United States. The company operates as a retail VoIP provider and does not own or operate transmission facilities, softswitch infrastructure, or direct interconnections to the public switched telephone network (PSTN).

All call origination, routing, STIR/SHAKEN authentication, and network-level robocall mitigation functions are performed by upstream platform providers and underlying carriers utilized by the company. The company relies on these upstream providers for implementation of STIR/SHAKEN caller ID authentication and compliance with FCC robocall mitigation requirements.

Although the company does not implement STIR/SHAKEN directly, it maintains policies and procedures designed to prevent the origination of illegal robocalls on its services. These measures include:

- Customer identity verification and account validation prior to service activation
- Acceptable use policies prohibiting illegal robocalling and spoofing
- Monitoring of customer traffic patterns for suspicious activity
- Investigation and suspension of accounts associated with suspected illegal robocalls
- Cooperation with traceback requests from the FCC, law enforcement, and industry traceback consortiums
- Reliance on upstream carrier analytics, blocking, and authentication frameworks

The company commits to responding promptly to all lawful traceback requests and to cooperating fully with regulatory and law enforcement authorities in identifying and preventing illegal robocall traffic.

Because the company does not control network elements that originate calls to the PSTN and relies on upstream providers for STIR/SHAKEN implementation, it qualifies as a voice service provider without a STIR/SHAKEN implementation obligation under 47 CFR § 64.6301(a)(2).