

Robocall Mitigation Program Description
Data Stream Communications, LLC
FCC Robocall Mitigation Database Filing

1. Company Overview

Data Stream Communicatinos, LLC (“Company”) is a non-facilities-based Voice over IP (VoIP) service provider that offers hosted voice and unified communications services to business and residential end users. The Company operates as a reseller utilizing underlying network and carrier infrastructure, including call authentication services performed by upstream providers. The Company does not operate its own switching network for PSTN interconnection and does not possess an SPC token or STI certificate.

2. STIR/SHAKEN Authentication Status

The Company has not implemented the STIR/SHAKEN caller ID authentication framework on its own network pursuant to 47 CFR § 64.6301. The Company relies on its underlying carrier and network provider(s) to perform STIR/SHAKEN authentication on calls originated by the Company’s end users. While the Company does not directly sign calls, it ensures that its upstream providers implement and maintain STIR/SHAKEN compliance consistent with applicable FCC requirements.

3. Robocall Mitigation Commitment

All calls originated by the Company are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a). The Company takes reasonable and proactive steps to prevent its network from being used to originate illegal robocalls and cooperates fully with traceback and enforcement efforts.

4. Customer Vetting and Know-Your-Customer (KYC) Procedures

Prior to service activation, the Company performs reasonable due diligence to verify customer identity and legitimacy, including where appropriate:

- Collection of business registration and contact information
- Validation of customer identity and business purpose
- Review for suspicious or high-risk indicators
- Confirmation of lawful intended use of voice services

The Company reserves the right to deny or terminate service for customers that cannot be adequately verified or that present elevated risk of illegal calling activity.

5. Traffic Monitoring and Detection

The Company monitors outbound traffic patterns for indicators of illegal or suspicious robocalling behavior, including but not limited to:

- Unusual call volume or velocity
- Short duration/high-frequency calling patterns
- Sequential or predictive dialing behavior
- High complaint or traceback activity
- Irregular geographic calling distribution

Where suspicious activity is detected, the Company investigates promptly and takes corrective action.

6. Mitigation and Enforcement Actions

If the Company identifies suspected illegal robocall activity, it may take one or more of the following actions:

- Immediate suspension or termination of service
 - Blocking of specific call traffic or destinations
 - Customer investigation and remediation requirements
 - Cooperation with upstream carriers to stop abusive traffic
 - Escalation to law enforcement or regulatory authorities where appropriate
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7. Traceback Cooperation

The Company commits to respond fully and within **24 hours** to all traceback requests from:

- The Federal Communications Commission (FCC)
- Law enforcement agencies
- The Industry Traceback Consortium

The Company maintains internal procedures to promptly investigate traceback requests and identify the source of suspicious traffic.

8. Upstream Carrier Coordination

The Company works closely with its underlying network and carrier partners to ensure:

- STIR/SHAKEN authentication is properly applied upstream
 - Illegal robocall traffic is identified and mitigated quickly
 - Traceback and enforcement actions are coordinated
 - Network integrity and compliance are maintained
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9. Recordkeeping and Compliance

The Company maintains records related to:

- Customer identity and onboarding verification
- Traffic monitoring and investigations
- Mitigation actions taken
- Traceback responses and cooperation

The Company reviews and updates its robocall mitigation practices periodically to remain compliant with FCC rules and evolving industry standards.

10. Certification

The Company certifies that:

- All calls it originates are subject to this robocall mitigation program
 - It takes reasonable steps to avoid originating illegal robocalls
 - It cooperates fully with traceback and enforcement efforts
 - This program is implemented consistent with 47 CFR § 64.6305(a)
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