

1. Company Role

TrueTelecom LLC is a domestic interconnected VoIP Voice Service Provider. We assign phone numbers, provide VoIP service, and originate domestic calls into the PSTN. We do *not* receive foreign traffic and do *not* act as a gateway or intermediate carrier.

2. STIR/SHAKEN Status and Exemption

TrueTelecom LLC selects Option 3: No STIR/SHAKEN Implementation. SkySwitch, our upstream carrier, does not provide STIR/SHAKEN signing for reseller traffic. Under 47 CFR § 64.6301(a)–(b), providers lacking an all-IP SIP network capable of generating PASSporT tokens are exempt. We therefore maintain a robocall mitigation program in compliance with 47 CFR § 64.6305(a).

3. Customer Vetting (KYC)

All customers undergo identity and business verification, address validation, and use-case review. High-risk categories (telemarketing, call centers, auto-dialers, lead generators) receive enhanced vetting. Accounts failing verification are denied service.

4. Traffic Monitoring

We continuously monitor outbound traffic for high-volume bursts, short-duration patterns, sequential dialing, invalid caller ID, and behavior inconsistent with the customer's normal traffic profile. Alerts trigger immediate review.

5. Mitigation Actions

If suspicious or illegal traffic is detected, we may block calls, suspend outbound service, require re-verification, or terminate the account. All actions are documented.

6. Traceback Cooperation

TrueTelecom LLC responds to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group within 24 hours, as required by FCC regulations.

7. Ongoing Compliance

We regularly audit customer traffic, review mitigation effectiveness, update monitoring tools, maintain compliance records, and adjust procedures to meet evolving FCC rules.

Certification:

TrueTelecom LLC certifies that all originated calls are subject to this mitigation program, that reasonable measures are taken to prevent illegal robocalls, that all traceback requests are answered within 24 hours, and that this filing is true and correct.

Signed:

Colin Crosby, Owner

Date: 02/24/2026