

Robocall Mitigation Program Description

Company Information:

Legal Name: Wireless Etc

FCC Registration Number (FRN): 0018337253

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Upstream Voice Providers: Atheral and NUSO

Company Overview:

Wireless Etc is a facilities-based Wireless Internet Service Provider (WISP) that resells interconnected VoIP services through upstream voice providers. Wireless Etc does not operate its own SIP core, softswitch, numbering platform, or STIR/SHAKEN authentication infrastructure. All switching, numbering resources, porting, and call authentication functions are handled by its upstream voice providers.

Regulatory Framework:

Pursuant to 47 CFR § 64.6305, voice service providers that have not implemented STIR/SHAKEN must maintain and certify a robocall mitigation program. Wireless Etc operates under this provision and certifies that all calls originated by its end users are subject to the mitigation practices described below.

Robocall Mitigation Practices:

1. **Customer Vetting:** Wireless Etc verifies customer identity prior to activating voice services. Business customers may be required to provide formation documents and identifying information. Higher-risk customers are subject to additional review.
2. **Terms of Service Restrictions:** Wireless Etc's Terms of Service prohibit the use of its services for illegal robocalling, caller ID spoofing, fraudulent traffic generation, or unlawful telecommunications activity. Violations may result in suspension or termination.
3. **Traffic Monitoring:** Wireless Etc monitors customer usage patterns for unusual call volumes, short-duration bursts, high answer-seizure ratios, and other indicators of potential robocall activity. Suspicious activity is investigated promptly.
4. **Upstream STIR/SHAKEN Authentication:** All outbound calls are routed through upstream providers ({upstream_providers}) that have implemented STIR/SHAKEN authentication. Wireless Etc relies on these providers for call signing and attestation.
5. **Traceback Cooperation:** Wireless Etc commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Consortium and will cooperate in investigations.
6. **Recordkeeping:** Wireless Etc maintains records sufficient to identify customers associated with originating traffic and will provide such records in response to lawful requests.

Certification:

Wireless Etc certifies that it has not been prohibited from filing in the Robocall Mitigation Database and that this robocall mitigation program is implemented in good faith to prevent the origination of illegal

robocalls, consistent with 47 CFR § 64.6305.