

Robocall Mitigation Program Description

Conecta Cloud LLC is a non-facilities-based interconnected VoIP provider serving end users. The company originates interconnected VoIP traffic through its wholesale platform provider, SkySwitch, and its underlying carrier partners.

All outbound calls placed by Conecta Cloud customers traverse upstream voice service providers that have implemented the STIR/SHAKEN authentication framework in compliance with 47 CFR § 64.6301. Accordingly, STIR/SHAKEN authentication is applied to calls originated by Conecta Cloud through its wholesale platform and carrier partners.

In addition to relying on upstream authentication, Conecta Cloud maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a), which includes:

- Know-Your-Customer (KYC) procedures prior to activating voice services
- Verification of customer identity and business purpose
- Contractual prohibitions against unlawful robocalling and traffic pumping
- Ongoing monitoring of traffic patterns for abnormal volume, short-duration calls, sequential dialing behavior, or other indicators of illegal robocall activity
- Immediate investigation and suspension of customers suspected of originating unlawful traffic
- Cooperation with its wholesale provider and underlying carriers to prevent illegal traffic from traversing the network

Conecta Cloud commits to responding fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the Industry Traceback Consortium, and to cooperating in identifying and stopping illegal robocall traffic.

Conecta Cloud does not operate its own switching facilities or direct PSTN interconnections and relies on its wholesale provider and carrier partners for network-level STIR/SHAKEN implementation and authentication.