

Robocall Mitigation Program

Filed Pursuant to 47 CFR § 64.6305

Reseller-Only VoIP Provider

Company Name: Layer One Technology Solutions

FRN: 0025262346

SPIN (498 ID): 143048678

Business Address: 12340 Crain Highway, Suite 100, Newburg, MD 20664

Contact Name: Jason Thompson

Title: Founder & Principal

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1. Company Classification

Layer One Technology Solutions (“Layer One”) operates as a **non-facilities-based, reseller-only interconnected VoIP provider**.

Layer One:

- Does not own or operate transmission facilities.
- Does not directly originate SIP traffic onto the PSTN.
- Purchases voice services from upstream facilities-based carriers.
- Resells interconnected VoIP services to end users and business customers.

All PSTN access and SIP trunking are provisioned through upstream carriers that are responsible for implementing STIR/SHAKEN authentication within their IP networks.

2. STIR/SHAKEN Implementation Status

Layer One does **not directly implement STIR/SHAKEN authentication** because it is a non-facilities-based reseller and does not control the IP network elements where attestation is applied.

Layer One relies on its upstream facilities-based carriers to:

- Implement STIR/SHAKEN authentication and verification
- Apply appropriate attestation levels
- Maintain compliance with FCC STIR/SHAKEN mandates

Layer One only partners with upstream carriers that certify compliance with FCC STIR/SHAKEN requirements.

3. Robocall Mitigation Measures

Although Layer One does not directly originate traffic, it actively mitigates illegal robocalls through the following controls:

3.1 Know-Your-Customer (KYC) Procedures

Prior to activating voice service, Layer One:

- Verifies business entity registration via Secretary of State records
- Confirms tax ID/EIN (where applicable)
- Validates physical business address

- Screens principals against OFAC sanctions lists
- Reviews intended call use case and traffic profile
- Requires signed service agreements prohibiting illegal robocalls

Enhanced due diligence is performed for higher-risk customers, including:

- Call centers
- Telemarketing operations
- High-volume outbound dialing businesses
- Political or mass-notification platforms

3.2 Contractual Safeguards

All customer agreements expressly prohibit:

- Transmission of illegal robocalls
- Spoofing of caller ID in violation of the Truth in Caller ID Act
- Transmission of traffic without proper consent
- Use of misleading, invalid, or unassigned numbers

Contracts provide Layer One authority to:

- Immediately suspend suspicious traffic
- Demand documentation of consumer consent
- Terminate service upon violation
- Report illegal activity to appropriate authorities

3.3 Traffic Monitoring & Risk Controls

Layer One monitors customer traffic patterns through upstream carrier reporting and internal analytics, including:

- Abnormal call volumes
- Short-duration call bursts

- Sequential dialing patterns
- Elevated complaint ratios
- Unusual answer-seizure ratios (ASR)

Where Layer One does not have direct SIP visibility, it works with upstream carriers to obtain traffic data necessary for investigation.

3.4 Complaint Handling & Investigation

Layer One maintains procedures to:

- Promptly review consumer complaints
- Investigate suspected illegal robocall activity
- Contact customers for explanation and documentation
- Coordinate with upstream carriers for mitigation

If credible evidence of illegal robocalls exists:

1. Traffic is suspended immediately.
 2. Customer is required to provide consent documentation.
 3. Service is terminated if violation is confirmed.
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3.5 Traceback Cooperation

Layer One fully cooperates with:

- The FCC
- Law enforcement agencies
- The Industry Traceback Group (ITG)

Layer One:

- Responds to traceback requests within required timelines.
- Identifies upstream providers and customer accounts.
- Maintains sufficient records to support traceback investigations.

Traceback Contact:

Jason Thompson

jthompson@layeronecorp.com

3.6 Upstream Carrier Controls

Layer One:

- Procures voice services only from reputable, FCC-compliant carriers.
 - Requires upstream providers to maintain STIR/SHAKEN implementation.
 - Investigates and resolves any upstream notifications of suspicious traffic.
 - Terminates customers when required by upstream enforcement actions.
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3.7 Record Retention

Layer One retains:

- Customer onboarding documentation
- Signed service agreements
- Traffic records (as available through upstream carriers)
- Investigation documentation
- Traceback correspondence

Records are maintained consistent with FCC requirements.

4. Governance & Oversight

Robocall mitigation compliance is overseen by executive leadership.

The Founder & Principal is responsible for:

- Enforcement of customer vetting standards
- Investigation of suspicious traffic
- Response to traceback requests
- Compliance with 47 CFR § 64.6305

Policies are reviewed periodically to ensure continued compliance with evolving FCC rules and industry best practices.

5. Certification

I certify under penalty of perjury that:

- The information contained in this Robocall Mitigation Program is true and accurate.
 - Layer One Technology Solutions is complying with 47 CFR § 64.6305.
 - The company is actively mitigating the origination of illegal robocalls consistent with its status as a reseller-only interconnected VoIP provider.
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Jason Thompson

Founder & Principal

Layer One Technology Solutions

Date: 03/02/2026