

Robocall Mitigation Program Description

PhoneAll Cloud LLC

FCC FRN: 0037568029

PhoneAll Cloud LLC operates as a non facilities based interconnected Voice over Internet Protocol (VoIP) service provider serving business end users within the United States. PhoneAll Cloud LLC does not operate facilities-based switching infrastructure and relies on compliant upstream carriers for PSTN interconnection and call authentication.

1. STIR/SHAKEN Implementation

PhoneAll Cloud LLC transmits all outbound traffic through upstream carrier partners that have fully implemented the STIR/SHAKEN authentication framework in accordance with 47 CFR § 64.6301.

PhoneAll Cloud LLC does not originate unauthenticated TDM traffic and does not maintain direct SS7 interconnections.

2. Robocall Mitigation Practices

PhoneAll Cloud LLC maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a), which includes reasonable steps to prevent the origination of illegal robocall traffic. These steps include:

- Know-Your-Customer (KYC) review of new business customers
- Prohibition of unlawful robocalling and spoofing in customer agreements
- Monitoring for unusual or high-volume outbound calling patterns
- Immediate investigation of suspicious traffic alerts
- Suspension or termination of service upon detection of illegal activity

PhoneAll Cloud LLC serves legitimate business customers and does not knowingly support telemarketing campaigns that violate federal or state law.

3. Traceback Cooperation

PhoneAll Cloud LLC commits to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the Industry Traceback Group. The designated robocall mitigation contact listed in this filing is authorized to receive and respond to such requests.

4. Upstream Carrier Controls

All outbound traffic is routed through established U.S.-based wholesale carriers that maintain their own STIR/SHAKEN implementation and robocall mitigation programs. PhoneAll Cloud LLC does not directly interconnect with foreign carriers and does not operate as a gateway provider.

5. Ongoing Compliance

PhoneAll Cloud LLC reviews its mitigation practices periodically to ensure continued compliance with FCC regulations and industry best practices. The company maintains internal procedures to identify, investigate, and remediate potential robocall abuse