

Robocall Mitigation Program Description

Santas AI Lab Inc (operating as Stella Foster)

FRN: 0038115101

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1. Company Overview

Santas AI Lab Inc, operating under the brand name Stella Foster, is an application-layer voice service provider headquartered in Santa Monica, California. Stella Foster provides an AI-powered assistant service that enables users to place and receive phone calls and SMS messages via a software application. All voice traffic is originated and transmitted through Bandwidth Inc., a licensed telecommunications carrier.

2. Role in the Call Chain

Santas AI Lab Inc functions as a Voice Service Provider that does not own or operate its own telecommunications network infrastructure. The company does not have direct access to network-level call signaling. All calls placed through the Stella Foster service are routed through Bandwidth Inc., which maintains its own STIR/SHAKEN implementation and robocall mitigation program. As an application-layer provider, Santas AI Lab Inc relies on Bandwidth Inc. for all underlying network services.

3. STIR/SHAKEN Implementation

Santas AI Lab Inc has not implemented the STIR/SHAKEN authentication framework on any portion of its network, as the company does not operate network infrastructure. Pursuant to 47 CFR § 64.6301(b)(2), the company qualifies for an exemption as an application-layer provider that does not directly originate calls on its own network. STIR/SHAKEN authentication is handled by Bandwidth Inc. at the network level.

4. Robocall Mitigation Measures

Although Santas AI Lab Inc does not operate its own network, the company has implemented the following measures to prevent illegal robocall traffic originating from its service:

- **User Authentication:** All users are required to register and verify their identity before accessing the Stella Foster service. Account creation requires a verified phone number and email address.
- **Terms of Service Enforcement:** Users agree to Terms of Service that explicitly prohibit use of the service for illegal robocalling, spoofing, or any form of harassment. Violations result in immediate account termination.
- **Usage Monitoring:** The company monitors call volume and usage patterns to identify anomalous behavior consistent with automated or bulk calling activity.

- **User-Initiated Calls Only:** The Stella Foster service is designed so that all calls are initiated by individual end-users on a one-to-one basis. The platform does not support bulk or automated outbound calling campaigns.
- **Carrier-Level Protections:** By routing all traffic through Bandwidth Inc., the company benefits from Bandwidth's existing STIR/SHAKEN implementation and robocall mitigation infrastructure.
- **Traceback Cooperation:** Santas AI Lab Inc commits to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service.

5. Contact Information

For all robocall mitigation inquiries, traceback requests, or compliance matters:

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