

Robocall Mitigation Program Description

REDACTED VERSION

Smart Venues AI LLC d/b/a ClearBeam

FCC Registration Number (FRN): 0037609542

Date: March 09, 2026

1. Company Overview

Smart Venues AI LLC, doing business as ClearBeam, is a facilities-based Voice over IP (VoIP) provider offering residential and small business telephone service. ClearBeam operates as a voice service provider originating calls on behalf of its subscribers over its own SIP infrastructure, with interconnection to the Public Switched Telephone Network (PSTN) through upstream carrier partnerships. ClearBeam's principal place of business is 911 E Pike St, Suite 333, Seattle, WA 98122.

2. STIR/SHAKEN Implementation Status

ClearBeam has fully implemented the STIR/SHAKEN caller ID authentication framework as defined in 47 CFR § 64.6301. The current implementation includes:

- **Outbound call signing:** All calls originated by ClearBeam subscribers are routed through our upstream PSTN carrier (Flowroute/Intrado), which signs 100% of outbound calls with STIR/SHAKEN attestation. Calls placed from ClearBeam-provisioned DID's receive Attestation Level A (Full) or Attestation Level B (Partial) depending on number assignment and porting status.
- **Inbound signature verification:** ClearBeam's Session Border Controller (Kamailio SBC) performs cryptographic verification of STIR/SHAKEN Identity headers on all inbound PSTN calls using the secsipid module. Verification results (attestation level, pass/fail) are logged and used to inform call routing decisions.
- **Trust-based call routing:** Inbound calls with Attestation C (gateway), failed verification, or missing Identity headers are subjected to additional screening (DTMF challenge) before being connected to the called party. Calls with Attestation A or B are connected without delay.

All calls originated by ClearBeam are signed with STIR/SHAKEN attestation via our upstream carrier, and all inbound calls are cryptographically verified at the SBC. ClearBeam's STIR/SHAKEN implementation covers 100% of originated and terminated call traffic.

3. Robocall Mitigation Measures

ClearBeam employs the following reasonable steps to avoid originating illegal robocall traffic on its network, consistent with 47 CFR § 64.6305(a):

3.1 Subscriber Verification and Onboarding

- All new subscribers undergo identity verification during the activation process, including address validation and payment method verification.
- Each subscriber account is provisioned with a limited number of telephone lines appropriate for residential or small business use.
- Subscriber terms of service explicitly prohibit the use of ClearBeam services for illegal robocalling, spoofing, or any form of unsolicited bulk calling.

3.2 Network-Level Call Monitoring and Blocking

- **Global spam number database:** ClearBeam maintains a database of known spam and robocaller numbers, sourced from FTC Do Not Call complaint data and FCC consumer complaint filings. This database is updated regularly and used to block or flag inbound calls with configurable complaint-count thresholds.
- **Hot spam blocklist:** ClearBeam operates a real-time, in-memory blocklist at the SBC layer for immediate blocking of numbers involved in active spam campaigns targeting ClearBeam subscribers. Numbers can be added instantly via administrative API.
- **Per-tenant call blocking:** Individual subscribers can maintain personal blocked number lists and safe caller lists, providing granular control over inbound call filtering.
- **DTMF screening:** Calls from unverified sources (STIR/SHAKEN Attestation C, failed verification, or absent Identity headers) are subjected to a randomized DTMF challenge that effectively blocks automated robodialers while allowing legitimate human callers to connect.

3.3 Traffic Pattern Analysis

- ClearBeam monitors call detail records for anomalous traffic patterns indicative of robocalling activity, including unusually high call volumes from individual lines, short-duration call patterns, and calls to sequential number ranges.
- Subscribers generating traffic patterns consistent with illegal robocalling are subject to immediate service suspension pending investigation.

3.4 Enforcement Actions

- ClearBeam reserves the right to immediately suspend or terminate service for any subscriber found to be originating illegal robocall traffic.
- ClearBeam will cooperate with law enforcement and regulatory agencies in the investigation and prosecution of illegal robocallers.

4. Traceback Cooperation Commitment

ClearBeam 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 (ITG) operated by USTelecom. ClearBeam will cooperate with such entities in investigating and stopping any illegal robocallers that use ClearBeam's service to originate calls. ClearBeam maintains call detail records sufficient to support traceback investigations and has designated the following point of contact for traceback requests:

Traceback Contact: ClearBeam Network Operations Center
Email: [REDACTED]
Phone: [REDACTED]
Address: 911 E Pike St, Suite 333, Seattle, WA 98122

5. Caller ID Authentication Practices

ClearBeam ensures that all outbound calls carry accurate caller ID information corresponding to telephone numbers assigned to the originating subscriber. ClearBeam does not permit its subscribers to transmit misleading or inaccurate caller identification information in violation of the Truth in Caller ID Act (47 U.S.C. § 227(e)). Outbound caller ID is programmatically set to the subscriber's provisioned DID prior to call origination.

6. Known Robocall Sources and Mitigation

As of the date of this filing, ClearBeam has not identified any subscribers originating illegal robocall traffic on its network. ClearBeam's subscriber base consists of residential households and small businesses. Should illegal robocall activity be identified, ClearBeam will take immediate action including service suspension, cooperation with traceback investigations, and reporting to the FCC Enforcement Bureau.

7. Certification

I, Timosthy M. Semakula, Chief Executive Officer of Smart Venues AI LLC d/b/a ClearBeam, certify under penalty of perjury that the information contained in this Robocall Mitigation Program Description is true and correct to the best of my knowledge, and that ClearBeam is committed to maintaining and enhancing its robocall mitigation practices in compliance with FCC rules and regulations.

/s/ Timosthy M. Semakula

Timosthy M. Semakula

Chief Executive Officer

Smart Venues AI LLC d/b/a ClearBeam

Date: March 09, 2026