

Company Overview

Polaris SIP Voice LLC is a telecommunications provider offering SIP-based voice services including VoIP origination, termination, and related communications services. The company is committed to preventing the origination and transmission of illegal robocalls across its network and ensuring compliance with all applicable Federal Communications Commission (FCC) regulations.

Polaris SIP Voice LLC maintains policies, monitoring systems, and compliance procedures designed to prevent misuse of its services for unlawful robocalling or caller ID spoofing.

STIR/SHAKEN Implementation

At the core of STIR/SHAKEN is the concept of **attestation**, a label attached to a call indicating how confidently the originating provider can vouch for the call's identity and number. There are **three levels**:

A – Full Attestation

- Highest trust level
- Originating provider
- Authenticated the calling *customer*
- Verified the customer *has the right to use* the caller ID (telephone number)
- Knows the call *really originated* on its network.

B – Partial Attestation

- **Moderate trust.**
- Originating provider
- Authenticated the customer
- Did *not* verify that the customer has the right to use the specific caller ID number.

C – Gateway Attestation

- **Lowest STIR/SHAKEN trust level.**
- Originating provider:
- Has *no direct relationship with the customer*.
- Cannot verify the caller's identity or the number.
- Only confirms where the call entered its network (e.g., via an intermediate gateway).

Why These Attestation Levels Matter

- **Call Trust & Deliverability:** Higher attestation (especially A) signals high trust to terminating carriers and analytics engines — reducing the risk a legitimate call is mislabelled or blocked
- **Carrier Policy & Analytics:** Networks and analytic systems may use attestation levels to influence spam scoring and routing decisions. Lower levels can increase “spam likely” labels or degraded answer rates.
- **Regulatory Compliance:** After recent FCC order updates (effective from mid-2025), providers with STIR/SHAKEN obligations must *make their own attestation decisions* and use their own certificates — not rely solely on third parties — when signing calls.

Robocall Mitigation Program

Polaris SIP Voice LLC employs a robocall mitigation program that includes reasonable steps to prevent the origination, processing, or transmission of illegal robocalls.

Mitigation measures include:

Network Monitoring

- Continuous monitoring of traffic patterns for abnormal call behaviour.
- Automated alerts for suspicious call volumes, call durations, or rapid call attempts.

Traffic Analytics

- Use of internal or third-party call analytics tools to detect potential robocall traffic.
- Blocking or suspending suspicious traffic pending investigation.

Caller ID Verification

- Validation of caller ID information where possible.
- Monitoring for caller ID spoofing or invalid number presentation.

Rate Limiting

- Call rate thresholds to detect and mitigate robocall campaigns.

Immediate Suspension

- Immediate suspension of accounts found to be generating illegal robocalls.

These practices are designed to significantly reduce the likelihood that Polaris SIP Voice LLC's network is used to originate illegal robocalls.

Know-Your-Customer (KYC) Procedures

Polaris SIP Voice LLC performs due diligence before activating services for customers.

Customer verification procedures include:

- Collection of company name and legal entity information
- Verification of physical address and contact information
- Identity verification of account owners
- Review of intended use of telecommunications services
- Review of business websites and online presence where applicable

Accounts suspected of engaging in unlawful calling activity are suspended or terminated.

Know-Your-Upstream Provider (KYUP)

Polaris SIP Voice LLC maintains relationships only with reputable upstream carriers.

Before accepting traffic from upstream providers, Polaris SIP Voice LLC:

- Confirms the provider is listed in the FCC Robocall Mitigation Database
- Verifies the provider maintains robocall mitigation procedures
- Requires contractual obligations prohibiting illegal robocalls

Traffic from unverified providers may be blocked.

Traceback Cooperation

Polaris SIP Voice LLC commits to full cooperation with the following entities:

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

The company will respond to traceback requests within **24 hours** and provide relevant call records when requested. This commitment is required under FCC robocall mitigation rules

Complaint Handling

Polaris SIP Voice LLC maintains procedures to investigate complaints related to robocalls.

When complaints are received:

1. Traffic logs are reviewed.
2. The source of the call is identified.
3. The customer account is investigated.
4. Corrective action is taken, including suspension or termination if necessary.

Recordkeeping

Polaris SIP Voice LLC maintains call detail records (CDRs) and compliance logs sufficient to support investigations and traceback requests.

Records are retained in accordance with industry standards and applicable regulations.

Responsible Contact

Company: Polaris SIP Voice LLC

Compliance Contact: Legal Officer

Email: legal@voicepolaris.com

Phone: +1 712 642 1421

Address: 971 US Highway 202N, STE R, Branchburg, New Jersey 08876

This contact is responsible for responding to robocall mitigation inquiries and traceback requests.

Compliance Commitment

Polaris SIP Voice LLC is committed to maintaining a secure telecommunications network and preventing the misuse of its services for illegal robocalls.

The company will update this mitigation plan as required to comply with FCC regulations and evolving industry standards.