

Robocall Mitigation Plan

CALLISTROX LLC

Company Information

- Company Name: Callistrox LLC
- FRN: 0038115036
- FCC Form 499 Filer ID: 838711
- Principal Operating Address: 1001 S. Main St. #7752, Kalispell, MT 59901
- Website: <https://callistrox.com>
- Owner / Compliance Contact: Ghayoor Abbas

STIR/SHAKEN Implementation Status

Callistrox LLC has successfully implemented STIR/SHAKEN in compliance with applicable FCC regulatory requirements. The company is authorized to sign outbound calls using a valid STIR/SHAKEN certificate and follows ATIS standards and STI-GA policies. Callistrox LLC continues to maintain and monitor its STIR/SHAKEN implementation to ensure proper call authentication, attestation, and compliance with industry best practices.

Attestation Framework:

- **Full Attestation (A-Level):** Applied when Callistrox LLC has a direct contractual relationship with the calling customer, has validated their identity, and verified their authorization to use the displayed telephone number.
- **Partial Attestation (B-Level):** Used when we can authenticate the source provider but cannot independently verify the caller's authorization to use the presented number. Commonly applies to trusted wholesale partners.
- **Gateway Attestation (C-Level):** Assigned when calls enter our network from sources that cannot be fully authenticated or where caller identity verification is unavailable.

Unsigned Traffic Review: Traffic received without a STIR/SHAKEN signature is subjected to additional analysis through our fraud and compliance monitoring systems. Suspicious calls may be restricted, quarantined, or reviewed before further routing.

Business Model & Network Role

Callistrox LLC participates in the telecommunications ecosystem in two primary capacities:

Wholesale Services: A significant portion of our business consists of providing voice termination and interconnection services to carrier partners, resellers, and other telecommunications providers.

Direct Customer Services: We also maintain direct relationships with retail and business customers that originate traffic through our network and platform.

Estimated Traffic Distribution:

- Direct End-User Traffic: Approximately 5%–7%
- Wholesale and Reseller Traffic: Approximately 90%–95%

Robocall Mitigation Program

Callistrox LLC takes affirmative, effective measures to prevent its network from being used to originate illegal robocalls.

1. Know Your Customer (KYC) Procedures

- Identity verification of all customers prior to service activation
- Collection of valid identification, business registration records, and tax identification documentation
- Identity documentation required for authorized representatives
- Risk-based customer onboarding and screening
- Enhanced review for elevated-risk verticals including debt recovery, lead generation, healthcare communications, and political outreach

2. Traffic Monitoring & Analytics

- Continuous real-time monitoring of inbound and outbound call traffic
- Identification of suspicious patterns including: high call volume spikes, short-duration calls, sequential or auto-dialing behavior
- Analysis of short-duration calls to identify potential robocalling, survey campaigns, or automated traffic
- Automated alerts when traffic patterns indicate abnormal behavior or completion-rate anomalies

3. Call Blocking & Filtering

- Immediate blocking of suspicious or potentially illegal traffic
- Use of automated fraud detection and filtering systems
- Calls associated with known spoofing activity, suspicious caller IDs, or STIR/SHAKEN warnings may be blocked, rejected, or isolated

4. Do-Not-Originate (DNO) Protection

- Blocking of calls from invalid, unallocated, or spoofed numbers
- Use of industry-standard Do-Not-Originate lists and internally maintained risk databases

5. Traceback Cooperation

- Callistrox LLC fully cooperates with traceback efforts and industry partners including the U.S. Telecom Industry Traceback Group
- Responds to traceback requests within 24 hours or within the timeframe required by regulators
- Upon receiving a traceback inquiry, the compliance team investigates the traffic source and identifies the associated customer account
- Traceback records are retained for a minimum of two years

6. Upstream Provider Compliance

- Only reputable and compliant upstream carriers are utilized
- Preference given to providers that have implemented STIR/SHAKEN

7. Downstream Customer Enforcement & TCPA Controls

- All customers must agree to Terms of Service and Acceptable Use Policy mandating TCPA, TSR, and Do-Not-Call compliance
- Customers conducting outbound calling campaigns may be required to provide consent documentation

- Customer traffic is continuously monitored; unusual activity triggers investigation procedures
- Any violation results in immediate suspension and/or permanent termination

8. Record Retention

- Call Detail Records (CDRs) are maintained
- Logs and records are retained for a minimum of two years and made available upon request for regulatory or traceback purposes

9. Regulatory Compliance

- Callistrox LLC complies with all applicable FCC regulations regarding robocall mitigation and prevention
- Maintains compliance with TCPA requirements, TSR regulations, and applicable Do-Not-Call obligations

Network Security & Traffic Controls

To maintain network integrity and minimize abuse, Callistrox LLC employs multiple monitoring and enforcement mechanisms. Where policy violations are confirmed, service may be suspended immediately. Depending on the severity of the violation, accounts may be permanently terminated and prohibited from future use of our services.

Management & Public Presence

Callistrox LLC is a privately owned telecommunications company. Ghayoor Abbas serves as the owner and primary point of contact for compliance, operations, and carrier relations. Management remains directly accessible and actively involved in all day-to-day business and compliance matters.

The company is expanding its public business profiles and professional presence across relevant platforms. Government-issued identification of the owner has been provided in support of carrier due diligence review.

Submitted by:

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