

The filer is a non-originating third-party VoIP service provider that does not assign telephone numbers to end users and does not provide outbound calling capability. As such, the filer does not originate voice traffic and relies on upstream carriers for call origination and authentication.

To mitigate the risk of illegal robocalls traversing its network, the filer has implemented the following measures:

1. The filer conducts due diligence on upstream providers and only partners with carriers that are compliant with FCC STIR/SHAKEN and robocall mitigation requirements.
2. The filer maintains policies and procedures to monitor network traffic for anomalous patterns that may indicate illegal robocall activity.
3. The filer will promptly investigate and respond to any traceback requests from the FCC, law enforcement, or the Industry Traceback Group, and will take appropriate action, including blocking or terminating service, if illegal activity is identified.
4. The filer maintains records of upstream providers and traffic routing to support traceback investigations.
5. The filer cooperates with industry partners and regulatory authorities to prevent the origination and transmission of illegal robocalls.

Because the filer does not originate calls, it does not have the ability to implement STIR/SHAKEN authentication and instead relies on upstream originating providers to perform call authentication. The filer will continue to monitor regulatory developments and update its mitigation practices as necessary to remain in compliance with FCC requirements.

The filer will take immediate steps to prevent transmission of suspected illegal traffic upon notification.