

Robocall Mitigation Program Description

The AquaTelecom Telephone Company
Non-Gateway Intermediate Provider Filing
Date: March 19, 2026

1. Introduction

The AquaTelecom Telephone Company (“AquaTelecom”) submits this Robocall Mitigation Program Description pursuant to 47 CFR § 64.6305(f). AquaTelecom is a domestic United States non-gateway intermediate provider that carries and processes voice traffic over its network using Session Initiation Protocol (SIP) infrastructure. AquaTelecom has fully implemented the STIR/SHAKEN authentication framework across its entire network, and all calls it carries or processes are compliant with 47 CFR § 64.6302.

2. STIR/SHAKEN Implementation

AquaTelecom has achieved complete STIR/SHAKEN implementation on its network. All SIP-based voice traffic carried or processed by AquaTelecom is subject to STIR/SHAKEN call authentication. AquaTelecom utilizes the Anveo Direct Hosted STIR/SHAKEN Signing Service to sign outbound calls with its own certificate in accordance with the STIR/SHAKEN framework. AquaTelecom verifies STIR/SHAKEN Identity headers on inbound calls received from upstream providers.

3. Reasonable Steps to Avoid Carrying or Processing Illegal Robocall Traffic

AquaTelecom has implemented the following reasonable steps to avoid carrying or processing illegal robocall traffic on its network:

a. Access Controls: AquaTelecom restricts SIP trunk access to explicitly allowlisted IP address ranges associated with its authorized upstream and downstream carrier partners. Inbound SIP traffic from unauthorized source addresses is rejected at the network edge by firewall rules enforced on AquaTelecom’s network gateway. No open or unauthenticated SIP registration is permitted.

b. Traffic Monitoring: AquaTelecom monitors call detail records and network traffic patterns for anomalous activity, including unusual call volumes, suspicious caller ID patterns, and high-frequency short-duration calls that may indicate illegal robocall activity.

c. No Third-Party Auto-Dialer Services: AquaTelecom does not provide auto-dialer, predictive dialer, or bulk calling services to any party. AquaTelecom does not permit third

parties to originate high-volume automated calls through its network.

d. Know-Your-Upstream-Provider Procedures: AquaTelecom maintains records of all upstream providers from which it accepts traffic, including business name, contact information, and verification of their Robocall Mitigation Database filing status. AquaTelecom does not accept traffic from providers that are not listed in the Robocall Mitigation Database or whose filings have been de-listed pursuant to enforcement action.

e. Call Authentication Verification: AquaTelecom inspects STIR/SHAKEN attestation levels on inbound calls. Calls arriving without valid Identity headers or with failed verification are flagged for review and may be subject to additional scrutiny or blocking consistent with applicable FCC rules and public safety safeguards.

4. Commitment to Cooperate with Traceback Requests

AquaTelecom commits to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium (currently operated by USTelecom – The Broadband Association). AquaTelecom further commits to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

5. Prior Enforcement Actions

The AquaTelecom Telephone Company has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing related to illegal robocalls, spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

6. Contact Information

Questions or traceback requests related to this Robocall Mitigation Program should be directed to the Robocall Mitigation Contact identified in AquaTelecom's filing in the FCC Robocall Mitigation Database.

Filed pursuant to 47 CFR § 64.6305(f). This document constitutes the complete Robocall Mitigation Program Description for The AquaTelecom Telephone Company.