

STARSPAN LLC

Robocall Mitigation Program Description

1. Company Information

Company Name:	STARSPAN LLC
FCC Registration Number (FRN):	0038203170
Principals, Affiliates, Subsidiaries, and Parent Company	Nishi Sharma

2. Certification of Caller ID Authentication Implementation

STARSPAN LLC certifies that STIR/SHAKEN implementation is **not required** on its network. The Company has therefore adopted a **Robocall Mitigation Program** to prevent the origination of illegal robocalls.

3. Robocall Mitigation Program

STARSPAN LLC has established a Robocall Mitigation Program to prevent the origination of illegal robocalls, which includes:

- Know Your Customer (KYC) procedures to vet all new customers.

STARSPAN LLC company has very limited customer there are less than 50 customers after pandemic COVID-19. All our customers are either office or residential landline customers. We don't have calling card or call center customers. No outbound call business for telemarketing customer. Each customer is on boarded by our business director Nishi Sharma, he knows every customer contact cell phone and name, our company customers are like a very small community customer base, we know each one name, phone, physical address, email and what type business they are operating, we know their usage pattern, how many minutes they do outbound and inbound calls. Our customers either have credit card on file or pay by check, we have direct communications with each one.

- Continuous monitoring of call patterns to detect suspicious robocall activity.

We actively review our DID usage report and outbound termination report, we have very limited spending on termination minutes, that tells us we don't have a lot of activities. If there is abnormal activity, our usage report will show it we will take action immediately shut that business down or block it. Another one aspect to monitor it is credit card charge, all termination usage got billed to our credit card by our termination service provider, we can realize the issue right away, we will take action too to block that suspicious user.

- Use of call blocking and analytics tools to identify and stop unlawful robocall traffic.

If there is unlawful robocall traffic, we can block that customer account from our VOIP Admin portal or we can go to termination service provider to request to block that traffic. But so far, nothing has happened on our network, our termination traffic is very low. Again, we only serve regular office normal worker use our phone service, no call center business definitely no telemarketing call business user.

- Cooperation with the Industry Trace back Group (ITG) by responding to trace back requests within 24 hours.

We have limited termination traffic, if there is any suspicious traffic, we can go to our VOIP SIP server database (MySQL server) to query all traffic history and we will know immediately and we can take action less than 2 hours to block the suspicious traffic.

- Enforcement measures including termination of service to customers found to be originating illegal robocalls.

If there is unlawful termination traffic, our company owner Nishi Sharma will go to SIP server to block and cancel that unlawful customer immediately. So far, nothing happens to network. Our company traffic still is very low.

4. Point of Contact for Trace back Requests

Name:	Nishi Sharma
Title:	Director
Department:	Legal
Business Address:	1021 E Lincoln way Suite 9831, Cheyenne, WY 82001
Telephone:	+1 312-248-7700 (Cell)
Email:	info@starspanllc.com

5. Certification

I, Nishi Sharma, certify under penalty of perjury that STARSPAN LLC has implemented the above-described Robocall Mitigation Program and will comply with FCC regulations.

Signature: 

Date: 3/25/2026