

Spirenet Telecom LLC

Robocall Mitigation Compliance Plan

I. SERVICE OVERVIEW

Spirenet Telecom LLC provides interconnected VoIP and related voice services. All voice traffic originating, transiting, or terminating on the network is governed by this Robocall Mitigation Program pursuant to 47 CFR § 64.6300 et seq.

II. ZERO-TOLERANCE COMPLIANCE POLICY

Spirenet Telecom LLC enforces a strict zero-tolerance policy against illegal robocalls, caller ID spoofing, traffic pumping, and TCPA violations. This applies to all customers and partners. Violations may result in immediate suspension or termination.

III. CUSTOMER VERIFICATION (KYC)

All customers undergo strict onboarding verification. Required documentation includes incorporation documents, government-issued ID, beneficial ownership, campaign details, consent proof, TCPA policies, dialing platform details, and number authorization. High-risk customers are subject to enhanced due diligence.

IV. STIR/SHAKEN AUTHENTICATION

Spirenet Telecom LLC is fully STIR/SHAKEN compliant. All IP-originated traffic is authenticated per 47 CFR § 64.6301. Full A-level attestation is applied where applicable. Non-IP traffic is subject to additional mitigation controls.

V. CALL AUTHENTICATION CONTROLS

Caller ID must correspond to authorized numbers. Unauthorized or invalid numbers are blocked. Caller ID rotation or spoofing is strictly prohibited without approval.

VI. NETWORK MONITORING & ANALYTICS

Advanced analytics systems monitor traffic patterns, detect anomalies, and block suspicious calls. Enforcement actions are triggered when irregular activity is detected.

VII. TRACEBACK RESPONSE

Spirenet Telecom LLC responds to traceback requests within 24 hours and cooperates fully with the Industry Traceback Group and enforcement agencies. Confirmed illegal traffic is blocked immediately.

VIII. ENFORCEMENT ACTIONS

Mitigation measures include call blocking, traffic restrictions, and service suspension or termination where necessary.

IX. COMPLIANCE MANAGEMENT

A designated Robocall Mitigation Officer oversees compliance. Regular audits, staff training, and escalation procedures are maintained.

X. RECORD RETENTION

All compliance records are retained for a minimum of five (5) years, including onboarding, traffic data, traceback responses, and enforcement actions.

XI. FCC CERTIFICATION

Spirenet Telecom LLC certifies full STIR/SHAKEN implementation, active robocall mitigation practices, and ongoing compliance with FCC requirements.

XII. CONTINUOUS IMPROVEMENT

The company continuously updates mitigation practices in alignment with FCC guidance and industry best practices.