

1. Company Overview

CTS 3 LLC operates as a reseller of VoIP services. We do not operate our own telecommunications network infrastructure. Instead, we procure services from an upstream provider and facilitate service provisioning, hardware management, and customer support.

2. Role in the VoIP Call Chain

CTS 3 LLC operates as an **Enterprise/Reseller** in the VoIP call chain. We do not directly originate, transmit, or terminate calls on the public switched telephone network. All call processing is handled by our upstream service provider.

3. STIR/SHAKEN Implementation Status

- CTS 3 LLC does not directly implement STIR/SHAKEN. All call authentication and signing is performed by our upstream service provider, which is responsible for compliance with STIR/SHAKEN requirements.
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4. Robocall Mitigation Practices

CTS 3 LLC does not directly manage call routing or traffic monitoring. Robocall mitigation, including traffic analysis and automated detection of suspicious calling patterns, is performed by our upstream service provider using their internal systems and controls.

We rely on our upstream provider's network-level protections to identify and mitigate illegal robocall activity. In addition, we:

- Respond to any complaints or reports of suspicious activity
 - Coordinate with our upstream provider to investigate and resolve issues
 - Take appropriate action, including suspension of services, if misuse is identified
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5. Customer Vetting Procedures

We perform due diligence on customers prior to enabling services, which may include:

- Identity verification
 - Business verification
 - Review of intended use of services
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6. Enforcement Actions

If a customer is found to be transmitting illegal robocalls our upstream provider performs the following:

- A prompt investigation, which may result in the suspension or termination of service pursuant to the results of the investigation. Any fully cooperate with LEO requests and traceback efforts.
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7. Traceback Response

CTS 3 LLC will work with our upstream provider and will cooperate with traceback requests and coordinate responses with our upstream provider as necessary to ensure timely compliance with industry obligations and regulatory requirements, including those of the U.S. Federal Communications Commission.

8. Commitment

CTS 3 LLC is committed to complying with all applicable regulations regarding robocall mitigation and will continue to rely on our upstream provider's network-level protections while enforcing responsible use of services by our customers.
