

Robocall Mitigation Program

Mela Roo Inc.

FCC Registration Number: 0038236089

April 6, 2026

Introduction and Business Model

Mela Roo Inc. (“the Company”), is a provider of Non-Interconnected VoIP services. The Company’s core business model is uniquely and expressly designed to prevent, intercept, and mitigate illegal robocalls and voice scams on behalf of its business customers.

Mela Roo Inc. provisions telephone numbers to act as screening proxies. Inbound calls are analyzed by the Company’s proprietary systems. If a call is deemed legitimate, the Company originates a new, clean outbound call leg to the business customer. Because the Company originates this outbound leg over the Public Switched Telephone Network (PSTN), it is filing this Robocall Mitigation Program to comply with 47 CFR § 64.6305.

Because the Company’s service exists entirely to stop spam and spoofed calls, preventing the origination of illegal robocalls is structurally inherent to Mela Roo Inc.’s operations.

STIR/SHAKEN Exemption Status and Practical Implementation

Mela Roo Inc. is filing under **Option 3 (No STIR/SHAKEN implemented)** and claims a standing exemption under **47 CFR § 64.6304(b)**.

The Company is structurally incapable of obtaining a Service Provider Code (SPC) token from the STI Policy Administrator because it does not possess an Operating Company Number (OCN) or direct numbering resources. All numbering resources and SIP trunking facilities are provisioned through the upstream facilities-based carrier, BulkVS (Peerless Network).

Voluntary Upstream Signing

While exempt from direct STIR/SHAKEN implementation, Mela Roo Inc. ensures that the public network is protected. The Company has enabled STI-AS (Authentication) and STI-VS (Verification) services at the network edge with its upstream carrier. As a result:

- **All inbound calls** are verified (STI-VS) to analyze caller ID attestation, which feeds directly into the Company’s scam-detection models.
- **All outbound calls** originated by the Company to its customers are cryptographically signed (STI-AS) by BulkVS utilizing valid caller IDs controlled by the Company, ensuring “A” Attestation delivery to downstream terminating providers.

Robocall Mitigation Practices

Mela Roo Inc. takes the following reasonable and affirmative steps to ensure it does not originate illegal robocall campaigns:

- **No Mass Outbound Calling.** The Company does not offer auto-dialers, predictive dialers, bulk telemarketing services, or API endpoints for customer-originated outbound campaigns.
- **Strict 1-to-1 Call Origination.** The only outbound traffic originated by the Company consists of individual, 1-to-1 forwarded calls directed exclusively to the Company’s vetted and paying business customers.
- **Caller ID Authenticity.** The Company strictly controls the Caller ID (ANI) for all originated outbound legs. The Company does not allow arbitrary Caller ID spoofing; outbound calls exclusively utilize DIDs properly provisioned and authorized to Mela Roo Inc.
- **KYC / Customer Vetting.** The Company enforces “Know Your Customer” (KYC) procedures. Outbound calls are only routed to verified businesses that have an established billing relationship with Mela Roo Inc.
- **Continuous Monitoring.** Because the Company’s platform utilizes AI and heuristics to detect voice scams on the inbound leg, the platform actively monitors traffic patterns, STIR/SHAKEN validation failures, and suspicious call volumes in real-time.

Traceback Commitment

Mela Roo Inc. is fully committed to assisting law enforcement, the FCC, and the industry in stopping illegal robocalls.

The Company commits to:

1. Responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) within **24 hours** of receipt.
2. Cooperating fully to identify the source of any suspicious traffic traversing its network.
3. Immediately terminating the account of any customer found to be utilizing the platform in violation of the Company's Acceptable Use Policy or federal law.

Point of Contact

For all traceback requests, compliance inquiries, or questions regarding this Robocall Mitigation Program:

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Company	Mela Roo Inc.
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