

CLOUD TREE LLC

Robocall Mitigation Program & Compliance Statement

Prepared for FCC Robocall Mitigation Database (RMD) Filing

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1. Executive Overview

Cloud Tree, LLC (“Cloud Tree”) is a U.S.-based voice service provider delivering SIP-based telecommunications services to business and residential customers. As part of its commitment to regulatory compliance and responsible network operation, Cloud Tree has implemented a robust robocall mitigation program in accordance with 47 CFR § 64.6305.

Cloud Tree operates in partnership with upstream carriers, including Bandwidth Inc., and leverages their network capabilities for call authentication and delivery. While Cloud Tree does not directly implement STIR/SHAKEN authentication within its own infrastructure, it maintains comprehensive controls to ensure that all originating traffic is verified, monitored, and compliant with applicable FCC regulations.

2. Network Role & Call Flow Architecture

Cloud Tree functions as an Originating Voice Service Provider (OVSP) for its end users.

Call Flow Model:

End User → Cloud Tree Network → Upstream Carrier (Bandwidth / SIPTrunk.com / RingLeader) → PSTN

- Cloud Tree originates customer traffic
- Bandwidth Inc. performs call authentication and downstream routing
- Cloud Tree does not act as a gateway provider and does not handle direct foreign-originated traffic

3. STIR/SHAKEN Compliance Position

Cloud Tree has not implemented STIR/SHAKEN authentication within its own network. Instead:

- Cloud Tree relies on its upstream carriers, including Bandwidth Inc., SIPTrunk.com, and RingLeader, to perform call authentication and attestation
- All outbound calls are routed through one or more upstream providers where STIR/SHAKEN is applied where technically feasible
- Cloud Tree ensures that all originating traffic is eligible for proper attestation by maintaining accurate customer identity records and enforcing strict onboarding controls

Cloud Tree remains fully compliant with FCC requirements by combining upstream authentication with internal mitigation controls.

All calls originating from Cloud Tree's network, regardless of upstream routing provider, are subject to this robocall mitigation program.

4. Customer Verification & KYC Framework

Cloud Tree enforces a strict Know Your Customer (KYC) policy to prevent misuse of its network.

Onboarding Controls Include:

- Verification of legal business name and registration
- Collection of physical address and contact information
- Validation of intended service use cases
- Risk-based evaluation prior to activation

Risk Controls:

- High-risk or unverifiable entities are denied service
- Enhanced due diligence is applied to suspicious or high-volume customers
- Anonymous or masked identities are strictly prohibited

5. Traffic Monitoring & Anomaly Detection

Cloud Tree employs both automated and manual monitoring mechanisms to detect and prevent illegal robocall activity.

Monitoring Capabilities:

- Call volume and velocity tracking
- Short-duration call pattern detection
- Sequential dialing analysis
- Caller ID integrity and spoofing checks

Response Triggers:

- Abnormal traffic spikes
- High call failure rates
- Repetitive or scripted call behavior

All flagged traffic is reviewed and escalated for immediate action.

6. Enforcement & Mitigation Actions

Cloud Tree maintains a zero-tolerance policy for illegal robocalling and spoofing.

Mitigation Measures:

- Immediate suspension of suspicious outbound traffic
- Account-level restrictions or termination
- Investigation of customer behavior and call patterns
- Coordination with upstream providers, including Bandwidth Inc., SIPTrunk.com, and RingLeader, for blocking, traceback, and enforcement actions

Cloud Tree reserves the right to terminate services without notice for confirmed violations.

Cloud Tree does not knowingly originate or facilitate illegal robocalls or caller ID spoofing and actively takes measures to prevent such activity on its network.

7. Traceback & Regulatory Cooperation

Cloud Tree is fully committed to supporting industry and regulatory traceback efforts.

Commitments:

- Respond to all traceback requests within 24 hours, or sooner where feasible, and provide complete and accurate call detail records sufficient to identify the source of the traffic
- Cooperate with:
 - FCC
 - Law enforcement agencies
 - Industry Traceback Group (ITG)
- Maintain sufficient data to trace call origin and routing

8. Recordkeeping & Data Retention

Cloud Tree maintains detailed operational records to support compliance and investigations.

Records Maintained:

- Customer identity and onboarding data
- Call Detail Records (CDRs)
- Traffic monitoring logs
- Enforcement and incident reports

Records are retained in accordance with industry standards and regulatory expectations.

9. Upstream Carrier Integration

Cloud Tree leverages multiple upstream carrier partners, including Bandwidth Inc., SIPTrunk.com, and RingLeader, as part of its telecommunications infrastructure.

These providers support:

- STIR/SHAKEN call authentication and attestation
- Compliant call routing and PSTN interconnection
- Network-level monitoring and mitigation capabilities

Cloud Tree coordinates with its upstream providers to ensure rapid response to suspicious traffic, enforcement actions, and traceback requests.

10. Compliance Certification

Cloud Tree, LLC certifies that:

- All originating calls are subject to a robocall mitigation program compliant with 47 CFR § 64.6305
- Reasonable and effective steps are taken to prevent illegal robocalls
- Full cooperation will be provided for all traceback and enforcement actions
- Continuous improvements will be made to maintain compliance with evolving FCC regulations

11. Continuous Improvement & Compliance Monitoring

Cloud Tree regularly reviews and updates its robocall mitigation practices to align with evolving FCC regulations, industry best practices, and guidance from traceback and enforcement authorities.

This includes periodic review of customer activity, traffic patterns, and upstream carrier requirements to ensure ongoing compliance and network integrity.

12. Contact Information

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