

Robocall Mitigation Program Description

Filing Entity: Innovspatial

Business Address: Plot No. 227, Hill Colony, Vanasthalipuram, Hyderabad, Telangana 500070, India

Robocall Mitigation Contact: Hemanth Koganti, hemanth@innovspatial.com

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1. Scope of Filing

Innovspatial uses interconnected VoIP/SIP services for its own internal business communications through a company PBX. The company does not offer, market, resell, or provide telephone service to third-party customers. Authorized users are company-approved personnel using named PBX extensions and softphone clients. The current upstream PSTN/SIP provider is Voxbeam.

This filing is submitted to support compliance requirements associated with U.S. call termination requested by the upstream provider. Innovspatial does not operate as a gateway provider or non-gateway intermediate provider carrying traffic for other providers.

2. STIR/SHAKEN Status And Exemption Basis

Innovspatial does not currently have its own STIR/SHAKEN implementation, Service Provider Code token, or certificate authority relationship. The appropriate certification selection for this filing is therefore Option 3: No STIR/SHAKEN Implementation.

Exemption basis: foreign voice service provider / foreign provider. Innovspatial is based in India and uses an upstream provider for PSTN interconnection. It does not operate U.S.-based STIR/SHAKEN authentication infrastructure and does not have its own SPC token or certificate. Under the FCC RMD FAQ for foreign providers, a foreign provider that sends calls using U.S. NANP numbers to U.S. providers must file in the RMD for that traffic to be accepted, but may certify to Option 3 - No STIR/SHAKEN Implementation and indicate that it is a foreign provider. Relevant references include 47 CFR 64.6300(c) and 47 CFR 64.6305(g)(2).

Innovspatial presents only caller IDs that it owns, leases, or is authorized to use. Caller IDs are configured in the PBX and with the upstream provider, and are intended to be valid, reachable telephone numbers in E.164 format.

3. Robocall Mitigation Measures

- The PBX is used for normal business calling only. Robocalling, spoofing, unlawful telemarketing, scam calls, and abusive traffic are prohibited.
- Only authorized internal users receive SIP credentials. Accounts are assigned to named extensions and are not sold or delegated to outside parties.
- SIP access is restricted by network controls where feasible. Administrative access to the PBX is restricted and is not exposed as a general public service.
- The PBX maintains call detail records and call recordings for external calls. These records can be reviewed to investigate suspicious activity or provider complaints.
- Outbound calling patterns, call volume, call destinations, and provider portal alerts are reviewed when abnormal behavior is suspected.
- If unauthorized or suspicious calling is detected, Innovspatial will disable affected extensions, rotate credentials, block traffic where necessary, and contact its upstream provider.
- Innovspatial does not knowingly originate illegal robocall traffic and will terminate any user access involved in prohibited traffic.

4. Know-Your-Customer And User Controls

Innovspatial does not onboard external telecom customers for this PBX. Users are known internal personnel approved by company management. The company maintains control over extension creation, SIP credentials, softphone provisioning, and PBX routing. No anonymous public signup or self-service customer provisioning is available.

5. Upstream Provider And Traffic Handling

Outbound PSTN traffic is routed through Voxbeam using an authenticated account and authorized source IP configuration. Innovspatial relies on its upstream provider for PSTN interconnection, provider-level compliance controls, and any network-level call treatment required for U.S. termination.

Innovspatial will cooperate with its upstream provider regarding caller ID validation, traffic review, complaint handling, and any additional documentation required to prevent unlawful calling.

6. Traceback And Law Enforcement Response

Innovspatial commits to respond fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, the registered industry traceback consortium, or its upstream provider. The response will include available call detail records, timestamps, caller ID information, called number information, user/extension information, and any relevant PBX logs or recordings that are lawfully available.

7. Analytics And Monitoring

Innovspatial does not currently use a separate third-party robocall analytics vendor. Monitoring is performed through PBX call detail records, call recordings, provider account controls, and manual review of unusual traffic patterns. The company may add additional analytics or provider controls if call volume or risk profile changes.

8. Enforcement History

To the best of the filing entity's knowledge, Innovspatial has not, in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing related to illegal robocalls, spoofing, or a deficient robocall mitigation certification or program description.

9. Certification Contact

Name	Hemanth Koganti
Role	Owner / Principal
Email	hemanth@innovspatial.com
Entity	Innovspatial

This program description should be updated if Innovspatial begins offering voice service to third-party customers, changes upstream providers, implements STIR/SHAKEN directly, changes ownership/control, or materially changes its robocall mitigation procedures.