

ROBOCALL MITIGATION PROGRAM DESCRIPTION

MSG91 LTD

Company Name:	MSG91 LTD
FCC Registration Number (RRN):	50364641672
Provider Classification:	Small Voice Service Provider
Contact Officer:	Shubhendra Agrawal, Compliance Officer
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EXECUTIVE SUMMARY

MSG91 LTD is a small Voice Service Provider with limited operations and minimal call volume to United States numbers. This Robocall Mitigation Program Description outlines the procedures and policies MSG91 LTD has implemented to prevent the origination of illegal robocalls, despite the company's small scale of operations. The company is committed to full compliance with FCC regulations and cooperation with regulatory authorities.

1. COMPANY SIZE AND SCALE OF OPERATIONS

Important Context: MSG91 LTD is a Small Voice Service Provider

MSG91 LTD respectfully requests the Commission's consideration of the following facts regarding the company's small size and limited operations, which are relevant to the assessment of the company's robocall mitigation program:

- **Active Telephone Numbers:** Approximately 10 active numbers
- **Monthly USA Call Volume:** Approximately 500-1,000 calls per month to United States numbers
- **Total Network Size:** Limited reseller network operating from upstream vendor partners
- **Customer Base:** Small base of business customers using voice services
- **Geographic Scope:** Primary operations focused on India/UK markets, with limited USA-bound traffic
- **Operational Model:** Reseller model - MSG91 LTD does not own underlying voice infrastructure

Implications of Small Size:

- Significantly lower risk profile compared to large-volume voice providers
- Limited capacity to be a source of mass illegal robocall campaigns
- Each customer account is individually managed and monitored

- All calls can be reviewed manually if necessary due to low volume
- Direct relationships with all customers enable rapid response to issues

2. COMPANY OVERVIEW AND SERVICE DESCRIPTION

MSG91 LTD is a small Voice Service Provider (VSP) that provides voice services to end-user business customers. The company operates as a reseller, acquiring voice capacity and telephone numbers from upstream vendor partners and providing voice services including inbound/outbound calling and voice bot capabilities to a limited number of business customers.

Service Offerings:

- Inbound voice call services for business customer support and customer engagement
- Outbound voice calling services for customer outreach and notifications
- Voice bot (automated voice response) services for customer interactions
- Call routing and forwarding services
- Voice service reselling to end-user business customers

3. ROBOCALL MITIGATION PROGRAM OVERVIEW

Despite MSG91 LTD's small size, the company has established a robocall mitigation program designed to prevent the origination and transmission of illegal robocalls on its network. This program is consistent with 47 CFR Section 64.6305(a) and is appropriately scaled to the company's operational size and call volume.

Program Objectives:

- Prevent origination of illegal robocalls on MSG91 LTD network
- Detect and address suspicious calling patterns
- Maintain compliance with FCC robocall mitigation requirements
- Respond rapidly to traceback requests within 24 hours
- Cooperate fully with authorities investigating illegal robocall activity

4. CALL TRAFFIC MONITORING AND VALIDATION

Given MSG91 LTD's limited call volume (approximately 500-1,000 USA calls per month), the company is able to maintain close oversight of its call traffic with manual review capabilities that may not be possible for larger providers.

Call Pattern Monitoring:

- Manual and automated monitoring of call patterns for unusual activity
- Detection of any unusual high-volume calling that may indicate misuse
- Identification of calls with spoofed or invalid caller identification
- Review of customer complaints and abuse reports

- Daily review of USA-bound traffic given limited volume

Traffic Validation Procedures:

- Verification that customer accounts are in good standing and authorized
- Validation of calling party identification (ANI) information
- Screening of calls for known fraudulent calling patterns
- Verification that calls originate from authorized customer accounts
- Individual review possible due to small customer base

5. CALL FILTERING AND BLOCKING PROCEDURES

MSG91 LTD has implemented call filtering procedures appropriate for its size. Due to limited call volume, the company can implement enhanced manual review alongside automated filtering.

- Call authentication filtering at network entry points
- Blocking of calls from known illegal robocall sources
- Filtering based on calling patterns indicative of illegal robocalls
- Blocking of calls with spoofed or invalid caller identification
- Rate-limiting of any unusually high-volume calling from accounts
- Manual review possible due to low call volume

6. CUSTOMER ACCOUNT MANAGEMENT AND CONTROL

Given MSG91 LTD's small customer base, the company maintains direct relationships with each customer and conducts thorough individual account reviews. This personal oversight is a significant advantage in preventing illegal robocall activity.

Customer Onboarding (Enhanced for Small Provider):

- Personal verification of customer identity and business purpose
- Direct communication with each customer about acceptable use
- Review of intended use of voice services on individual basis
- Collection of customer contact information and attestations
- Documented acceptable use agreement with each customer
- Individual approval of accounts based on business legitimacy

Ongoing Account Monitoring:

- Direct monitoring of each customer account
- Investigation of any abnormal calling patterns
- Personal communication with customers regarding any concerns

- Rapid suspension or termination of problematic accounts
- Monthly review of all USA-bound traffic given limited volume

7. CUSTOMER REPORTING AND SUPPORT PROCEDURES

MSG91 LTD provides direct mechanisms for customers to report suspected illegal robocalls. The small size of the operation allows for personal handling of all complaints.

- Email reporting to legal@msg91.com (monitored by Compliance Officer)
- Phone-based reporting to compliance team at +919977389948
- Direct response from Compliance Officer to all complaints
- Personal investigation of each reported concern
- Follow-up with customers regarding investigation outcomes

8. LAW ENFORCEMENT AND FCC COOPERATION (24-HOUR COMMITMENT)

MSG91 LTD commits to a 24-hour response time for all traceback requests, regardless of the source. The small size of the company actually enables faster response times than may be possible for larger providers.

Designated Traceback Contact:

- **Name:** Shubhendra Agrawal
- **Title:** Compliance Officer
- **Email:** legal@msg91.com
- **Phone:** +919977389948
- **Response Time:** Within 24 hours, often faster

Traceback Response Commitments:

- Respond to FCC traceback requests within 24 hours
- Respond to law enforcement traceback requests within 24 hours
- Respond to industry traceback consortium requests within 24 hours
- Provide call detail records and customer information as requested
- Take immediate action against identified illegal callers
- Faster response possible due to small operational scale

9. STIR/SHAKEN IMPLEMENTATION PLANS

Current Status: MSG91 LTD has not yet implemented STIR/SHAKEN authentication framework on its network. As a small reseller-based VSP, the company relies on upstream vendor partners for call authentication infrastructure.

Implementation Plan: MSG91 LTD is working with its vendor partners to coordinate STIR/SHAKEN implementation. The company will file updated certifications with the FCC as implementation progress is made and will transition to Option 2 (Partial Implementation) when STIR/SHAKEN is deployed.

Small Provider Considerations: Given MSG91 LTD's small size and limited USA call volume (approximately 500-1,000 calls/month), the company is working within its operational capacity and vendor relationships to implement STIR/SHAKEN appropriately.

10. STAFF TRAINING AND AWARENESS

All MSG91 LTD staff involved in voice service operations receive training on robocall mitigation procedures. Given the small team size, training is direct and personalized.

- Initial training for all staff on robocall identification and prevention
- Ongoing training on FCC regulations and compliance requirements
- Direct guidance from Compliance Officer on individual cases
- Training on traceback request procedures
- Regular updates on emerging threats and mitigation techniques

11. AUDIT AND COMPLIANCE REVIEW

MSG91 LTD conducts regular reviews of its robocall mitigation program. The small scale of operations enables comprehensive monthly audits.

- Monthly review of all USA-bound calls (feasible due to low volume)
- Review of call filtering and blocking actions
- Analysis of customer account activity
- Review of customer complaints and resolutions
- Assessment of traceback response timeliness
- Annual program update and enhancement

CONCLUSION

MSG91 LTD is a small Voice Service Provider with limited USA call volume (approximately 500-1,000 calls per month). Despite its small size, the company has implemented a comprehensive robocall mitigation program appropriately scaled to its operations. The company's small size actually enables certain advantages, including direct customer relationships, manual call review capabilities, and rapid response to traceback requests.

MSG91 LTD respectfully requests that the Commission consider the company's small size and limited USA call volume in evaluating this Robocall Mitigation Program Description. The company is fully committed to compliance with all FCC regulations and to cooperation with regulatory authorities, law enforcement, and the industry traceback consortium.

I certify that the foregoing Robocall Mitigation Program Description accurately describes the robocall mitigation procedures implemented by MSG91 LTD and is consistent with 47 CFR Section 64.6305(a). The information

provided regarding the company's small size and call volume is true and accurate to the best of my knowledge.

Shubhendra Agrawal

Compliance Officer, MSG91 LTD

May 08, 2026