

Robocall Mitigation Program & Customer Acceptable Use Policy

Company Name: Silver & Black Telecom

Service Type: Voice Service Provider (VoIP Reseller)

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FCC FRN: 0038250320

1. Purpose

This document outlines the Robocall Mitigation Program and Customer Acceptable Use Policy implemented by Silver & Black Telecom in accordance with **47 CFR § 64.6305**.

Silver & Black Telecom is committed to preventing the origination and transmission of illegal robocalls and ensuring compliance with all applicable laws and regulations.

2. STIR/SHAKEN Status

☒ **STIR/SHAKEN** is implemented by upstream provider(s) used by Silver & Black Telecom

☒ **Silver & Black Telecom** relies on upstream carrier(s) for caller ID authentication

Explanation:

As a VoIP reseller, Silver & Black Telecom utilizes underlying network infrastructure provided by upstream carriers that have implemented STIR/SHAKEN in their IP networks. Silver & Black Telecom does not directly control STIR/SHAKEN signing but ensures that all traffic is routed through compliant providers.

3. Robocall Mitigation Program

(47 CFR § 64.6305(d)(2)(ii))

Silver & Black Telecom has implemented a robocall mitigation program designed to prevent the origination and transmission of illegal robocalls over its voice network.

A. Customer Vetting (Primary Control)

Silver & Black Telecom does not permit anonymous or unverifiable customers to originate outbound traffic.

Customer onboarding and monitoring include:

- Collection of customer identity and business information prior to service activation
 - Validation of intended use of voice services (e.g., legitimate business communications)
 - Refusal of service to customers that present elevated risk
 - Maintenance of records of customer identity and service usage
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B. Traffic Monitoring & Review

Silver & Black Telecom monitors customer usage patterns to identify potential illegal robocall activity, including:

- Unusual spikes in outbound call volume
- Short-duration or repetitive call patterns
- Calls using invalid, unassigned, or suspicious caller ID numbers

Monitoring is performed using:

- Call Detail Records (CDRs) provided by upstream carrier systems
 - Account-level usage reviews
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C. Mitigation Actions

If illegal or suspicious robocall activity is detected, Silver & Black Telecom takes prompt action, including:

- Immediate suspension or termination of the customer account
 - Blocking of outbound calling capabilities
 - Coordination with upstream carrier(s) to stop traffic
 - Refusal to reinstate service without satisfactory explanation
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D. Use of Upstream Carrier Controls

Silver & Black Telecom relies on upstream carriers that implement:

- STIR/SHAKEN authentication
- Network-level robocall analytics and blocking
- Industry traceback participation

These upstream protections supplement internal mitigation measures.

E. Traceback Cooperation

Silver & Black Telecom cooperates with traceback requests from:

- USTelecom Industry Traceback Group
- Upstream providers
- Law enforcement and regulatory agencies

Silver & Black Telecom responds promptly and provides available records to assist in identifying the source of suspected illegal robocalls.

F. Recordkeeping

Silver & Black Telecom maintains records sufficient to:

- Identify customers originating traffic
- Review calling patterns
- Document mitigation actions taken

Silver & Black Telecom retains records of customer acknowledgment of acceptable use policies.

4. Reasonable Steps to Prevent Origination

(47 CFR § 64.6305(d)(2)(iii))

Silver & Black Telecom does not knowingly originate illegal robocall traffic and takes proactive measures to prevent such traffic from being transmitted over its voice network.

Reasonable steps include:

- Careful customer vetting prior to activation
 - Ongoing monitoring of customer traffic
 - Immediate action when suspicious behavior is identified
 - Reliance on upstream carrier protections and authentication frameworks
 - Enforcement of acceptable use policies governing customer behavior
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5. Customer Acceptable Use & Robocall Policy

All customers using Silver & Black Telecom services must comply with the following:

A. Prohibited Activities

Customers agree NOT to:

- Originate or transmit illegal robocalls
 - Use the service for unsolicited bulk calling in violation of applicable laws
 - Transmit misleading, inaccurate, or spoofed caller ID information
 - Use unassigned or invalid telephone numbers
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B. Customer Responsibilities

Customers agree to:

- Comply with all applicable federal and state laws, including telemarketing and robocall regulations
- Use services only for legitimate business or personal communications
- Provide accurate and verifiable identification information
- Respond promptly to any inquiry regarding suspicious traffic

C. Enforcement

Silver & Black Telecom enforces this policy and reserves the right to:

- Suspend or terminate service for suspected violations
 - Block outbound calling activity without notice
 - Report unlawful activity to upstream providers or appropriate authorities
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6. Customer Acknowledgment

By signing below or by using Silver & Black Telecom services, the Customer acknowledges and agrees to comply with this Robocall Mitigation Program and Acceptable Use Policy.

Customer Name: _____

Authorized Representative: _____

Signature: _____

Date: _____

7. Certification

I certify that the information provided is true and accurate and that Silver & Black Telecom has implemented a robocall mitigation program consistent with 47 CFR § 64.6305.

Authorized Representative: Kevin Shue

Title: Owner

Date: May 12, 2026
