

Robocall Mitigation Program Description

Apto Information Technology Ltd

FCC FRN: 0038447611

1. Company Description

Apto Information Technology Ltd is a foreign voice service provider and reseller of outbound voice services. The company provides services to end users and relies on upstream network providers for call transport and authentication functions.

2. STIR/SHAKEN Status

The filer does not implement the STIR/SHAKEN caller ID authentication framework within its own network infrastructure.

Pursuant to 47 CFR § 64.6305(d)(2)(ii), the filer does not have control over the network infrastructure necessary to implement STIR/SHAKEN authentication and therefore maintains a robocall mitigation program consistent with FCC requirements instead.

3. Robocall Mitigation Program

The filer maintains procedures intended to reduce unlawful robocall traffic and caller ID misuse, including:

Customer identity and account verification prior to activation.

Maintenance of customer records and assigned services.

Monitoring for unusual calling patterns, call volumes, complaint indicators, and suspicious behaviour.

Investigation of suspected abuse and application of restrictions, suspension, or termination where appropriate.

Contractual restrictions prohibiting unlawful robocalling and caller ID spoofing.

Cooperation with upstream providers and industry traceback processes.

4. Traceback and Response Procedures

The filer commits to:

responding to traceback requests promptly and within applicable FCC requirements;

preserving relevant records where appropriate;

cooperating with lawful requests and upstream providers investigating suspicious traffic.

5. Review Process

This robocall mitigation program is reviewed periodically and updated as services and operational controls evolve.