

CALITEN VOICE Robocall Mitigation & STIR/SHAKEN Compliance Manual

1. Purpose

This manual establishes Caliten Voice policies and procedures to prevent illegal robocalls, comply with FCC robocall mitigation requirements, support STIR/SHAKEN, and cooperate with traceback investigations.

2. Scope

Applies to all voice services, SIP trunking, DID management, customer onboarding, carrier relationships, and personnel involved in service delivery.

3. Governance

The Compliance Officer is responsible for annual review, maintaining the Robocall Mitigation Database filing, and coordinating with Engineering and Operations.

4. Customer Vetting

Verify business identity, authorized contacts, business purpose, service agreements, and intended call volumes before activation. Enhanced due diligence is performed for higher-risk customers.

5. Telephone Number Validation

Only DIDs assigned, ported, or otherwise authorized for a customer may be used as outbound Caller ID. Unauthorized spoofing is prohibited.

6. STIR/SHAKEN

Caliten Voice relies on STIR/SHAKEN implementation by supported SIP infrastructure and upstream providers where applicable and maintains compliance with FCC requirements.

7. Traceback

Traceback requests from the FCC, law enforcement, or the Industry Traceback Group receive priority handling. Target response time is within 24 hours whenever practical.

8. Monitoring

Engineering reviews CDRs, traffic anomalies, fraud alerts, authentication failures, and carrier analytics. Suspicious activity is investigated immediately.

9. Enforcement

Violations may result in suspension, termination, law-enforcement referral, and preservation of evidence.

10. Records

Maintain onboarding records, traceback requests, investigations, complaint logs, and annual review records in accordance with Project Lighthouse document control.

Appendix A

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Appendix B

Primary Upstream Provider: Skyetel Maintain current carrier contacts and escalation procedures.