



ROBOCALL MITIGATION PLAN

ZAP SYSTEMS LLC

Business Name: ZAP SYSTEMS LLC

DOS ID: 5840328

Date of Initial DOS Filing: 09/21/2020

County: Albany

Jurisdiction: New York, United States

Business Address: 418 Broadway, Ste N, Albany, NY 12207, United States

Chief Executive Officer: Terri Brown

1. Company Overview

ZAP SYSTEMS LLC is a New York limited liability company engaged in telecommunications, VoIP, SIP trunking, wholesale voice, DID, toll-free, and carrier interconnection services.

ZAP SYSTEMS LLC is committed to preventing illegal robocalls, spoofed caller ID traffic, fraudulent calling activity, scam traffic, and other unlawful use of telecommunications services.

2. Robocall Mitigation Commitment

ZAP SYSTEMS LLC maintains a robocall mitigation program designed to identify, prevent, monitor, investigate, and stop illegal robocall traffic on its network.

The company does not knowingly originate, transmit, route, or support unlawful robocall traffic, spoofed traffic, scam traffic, phishing, vishing, government impersonation, financial fraud, or traffic that violates FCC rules, TCPA requirements, FTC rules, or applicable U.S. law.

3. Customer Due Diligence and KYC

Before activating any customer, ZAP SYSTEMS LLC performs customer verification and risk review. The onboarding process may include:

- Verification of legal business name
- Business registration documents
- Business address verification



- Authorized representative details
- Government-issued ID where applicable
- Website and business activity review
- Use-case verification
- Traffic type confirmation
- Expected call volume, ACD, ASR, and call pattern review
- Source of traffic confirmation
- Caller ID ownership or authorization confirmation
- Review of prior abuse history where available

ZAP SYSTEMS LLC reserves the right to reject, suspend, or terminate any customer that fails verification or presents elevated fraud, robocall, spoofing, or compliance risk.

4. Traffic Monitoring

ZAP SYSTEMS LLC monitors traffic patterns to detect suspicious or unlawful activity. Monitoring may include:

- High-volume short-duration traffic
- Abnormal answer seizure ratio patterns
- Excessive call attempts
- High call failure rates
- Repeated calls to the same destination
- Use of invalid, unassigned, or unauthorized caller IDs
- Sudden traffic spikes
- Complaint-generating traffic
- Scam or impersonation indicators
- Traffic associated with DNO or blocked number lists



- Suspicious toll-free or DID usage
- International call pattern anomalies

When suspicious activity is detected, the company may immediately investigate, block, rate-limit, suspend, or terminate the customer or traffic source.

5. Caller ID and Number Validation

ZAP SYSTEMS LLC requires customers to use only valid, authorized, and traceable caller IDs. Customers are not permitted to use spoofed, invalid, disconnected, unassigned, or misleading telephone numbers.

The company may request proof of number ownership, LOA, customer authorization, or other documentation before allowing traffic using specific caller IDs.

6. STIR/SHAKEN Compliance

ZAP SYSTEMS LLC supports STIR/SHAKEN implementation where applicable and works with upstream, downstream, and technology partners to ensure proper caller ID authentication.

Where ZAP SYSTEMS LLC originates calls directly and has the ability to authenticate calls, the company will follow applicable STIR/SHAKEN requirements and assign attestation based on verified customer identity, caller ID authorization, and call origination information.

Where ZAP SYSTEMS LLC acts as an intermediate provider or does not have full control over origination authentication, the company will apply robocall mitigation controls and cooperate with originating and terminating providers to identify and stop illegal traffic.

7. Traceback Cooperation

ZAP SYSTEMS LLC will fully cooperate with traceback requests from the Industry Traceback Group, FCC, law enforcement, regulatory agencies, upstream carriers, downstream carriers, and other authorized parties.

The company will make commercially reasonable efforts to respond to traceback requests within 24 hours or sooner where possible.

Traceback response may include:



- Customer or upstream provider identification
- Call detail records
- Timestamp information
- Calling number and called number
- SIP signaling details where available
- Route or trunk information
- Corrective actions taken
- Suspension or termination status

8. Complaint Handling Procedure

When ZAP SYSTEMS LLC receives a complaint regarding suspected illegal robocalls, spoofing, scam calls, impersonation, fraud, or abusive traffic, the company will:

1. Review the complaint details.
2. Identify the customer, route, DID, trunk, or traffic source involved.
3. Pull call detail records and routing information.
4. Contact the customer or upstream provider for explanation where appropriate.
5. Suspend or block the involved traffic if the complaint appears credible.
6. Remove or disable the number, route, or account if abuse is confirmed.
7. Provide written response to the complainant, carrier, regulator, or traceback authority.
8. Maintain records of the investigation and corrective action.

9. Enforcement Actions

ZAP SYSTEMS LLC maintains a strict enforcement policy for unlawful or suspicious traffic.

Corrective actions may include:

- Warning notice



- Traffic blocking
- Caller ID blocking
- DID suspension
- SIP trunk suspension
- Route suspension
- Account suspension
- Permanent customer termination
- Refusal of future service
- Reporting to upstream carriers, regulators, or law enforcement where necessary

For serious violations, including government impersonation, financial scams, Social Security Administration impersonation, IRS impersonation, bank fraud, phishing, vishing, or repeated robocall complaints, ZAP SYSTEMS LLC may immediately terminate the customer without prior notice.

10. Customer Contract Requirements

ZAP SYSTEMS LLC requires customers to comply with all applicable laws and regulations, including:

- FCC rules
- TCPA requirements
- FTC rules
- Truth in Caller ID Act
- STIR/SHAKEN rules where applicable
- Robocall mitigation requirements
- Do-Not-Call requirements
- Industry traceback cooperation requirements



- Anti-fraud and anti-spoofing requirements

Customers are prohibited from using ZAP SYSTEMS LLC services for illegal robocalls, scam calls, spoofing, phishing, vishing, harassment, fraud, government impersonation, or any unlawful communication activity.

11. Upstream and Downstream Provider Controls

ZAP SYSTEMS LLC conducts reasonable diligence on carrier partners and may review:

- Legal business identity
- Contact information
- Network role
- RMD status where applicable
- OCN or carrier profile
- Traffic type
- Complaint history
- Technical interconnection details
- Compliance capability

The company will not knowingly accept, route, or exchange traffic with providers that are known bad actors or that fail to cooperate with traceback and abuse investigations.

12. Record Retention

ZAP SYSTEMS LLC maintains records related to customer onboarding, traffic logs, abuse complaints, traceback responses, corrective actions, and compliance reviews.

Records may include:

- Customer documents
- Service agreements
- Call detail records



- SIP logs where available
- Complaint tickets
- Investigation notes
- Suspension or termination notices
- Traceback responses
- Compliance communications

13. Network Security

ZAP SYSTEMS LLC maintains network security controls to prevent unauthorized access and misuse of its telecommunications systems.

Controls may include:

- IP authentication
- SIP credential management
- Access control
- Traffic limits
- Fraud monitoring
- Real-time route monitoring
- Firewall and network protection
- Administrative access restrictions
- Log monitoring

14. Ongoing Review

ZAP SYSTEMS LLC reviews and updates its robocall mitigation procedures as needed based on regulatory changes, industry best practices, complaint trends, traceback activity, and internal risk analysis.

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The company is committed to continuously improving its compliance program and preventing unlawful robocall traffic from entering, transiting, or originating from its network.

15. Certification Statement

ZAP SYSTEMS LLC certifies that it has implemented and will maintain a robocall mitigation program designed to prevent the origination, transmission, and routing of illegal robocall traffic.

ZAP SYSTEMS LLC further certifies that it will cooperate with traceback requests, investigate suspected unlawful traffic, take appropriate corrective action, and comply with all applicable FCC robocall mitigation and STIR/SHAKEN requirements.

Authorized Representative:

Terri Brown
Chief Executive Officer
ZAP SYSTEMS LLC

Date: 06/26/2026