

Robocall Mitigation Plan Company: Nova86 L.L.C. DBA Nova86 **FCC FRN:** 0038517165

Date: 7/13/2026

1. Network Overview and Architecture

Nova86 L.L.C. ("Nova86") operates as a non-facilities-based interconnected Voice over IP (VoIP) service provider. Nova86 utilizes software-based switching infrastructure, specifically FreeSWITCH and Asterisk, to originate voice traffic for our customers. All outbound PSTN traffic is routed through our upstream carrier, Bulk VS, for termination. As a reseller, Nova86 enforces strict robocall mitigation practices on our originating infrastructure before traffic ever reaches our upstream provider.

2. Know Your Customer (KYC) Procedures

To prevent bad actors from accessing the Nova86 network, we enforce rigorous KYC vetting prior to provisioning any SIP trunks or DIDs:

- **Identity Verification:** All prospective clients must provide a verifiable physical business address, a valid tax identification number, and contact information for a responsible individual.
- **Payment Validation:** We do not accept anonymous payment methods. All payments must clear via verified credit card or US bank transfer.
- **Traffic Profiling:** Customers must describe their intended use case (e.g., PBX, contact center) and provide expected call volume metrics. Accounts requesting auto-dialer or high-volume short-duration traffic are subjected to enhanced scrutiny or rejected entirely.

3. Technical Mitigation Measures

Nova86 actively monitors and restricts traffic using technical controls built into our Asterisk and FreeSWITCH core routing engines to prevent the origination of illegal robocalls:

Asterisk Controls:

- **Caller ID Validation:** We utilize the CALLERID(num) function within our Asterisk dialplans to strictly enforce outbound Caller ID. Endpoints are only permitted to transmit Caller ID values explicitly assigned to their account. Any attempt to spoof an unauthorized number results in immediate call rejection.

- **Concurrent Call Limiting:** We implement the GROUP() and GROUP_COUNT() functions to cap the maximum number of simultaneous channels a customer can open, preventing unauthorized high-volume dialer bursts.

FreeSWITCH Controls:

- **Rate Limiting (CPS):** To prevent robocall dialers from flooding the network, we utilize the FreeSWITCH limit application (e.g., limit hash user \${caller_id_number}) to strictly enforce Calls Per Second (CPS) thresholds at the ingress profile level.
- **Traffic Shaping & Format Validation:** Regular expression (regex) conditions are enforced within the FreeSWITCH XML dialplan to validate the structural integrity of dialed numbers and Caller IDs. Calls failing 10-digit NANP formatting are dropped with a 403 Forbidden response before being passed to Bulk VS.
- **Short Duration Call (SDC) Monitoring:** Call Detail Records (CDRs) generated by FreeSWITCH are actively monitored for anomalous patterns, specifically high percentages of calls lasting under 6 seconds, which is indicative of illegal robocalling.

4. STIR/SHAKEN Implementation

As a non-facilities-based reseller, Nova86 delegates STIR/SHAKEN token signing to our upstream facility-based carrier, Bulk VS. We guarantee that all outbound traffic passed to Bulk VS is pre-vetted, rate-limited, and explicitly restricted to valid, authorized Caller IDs, allowing Bulk VS to confidently sign the traffic with the appropriate STIR/SHAKEN attestation level.

5. Traceback Cooperation Commitment

Nova86 L.L.C. is fully committed to cooperating with the FCC, law enforcement, and the Industry Traceback Group (ITG). We commit to responding to all traceback requests regarding suspicious or illegal traffic within 24 hours of receipt. Customers found to be originating illegal robocall traffic will face immediate service suspension.

6. Point of Contact

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