

Robocall Mitigation Program Description

Submitted in connection with FCC Robocall Mitigation Database Certification — Voice Service Provider, Option 3 (No STIR/SHAKEN Implementation)

Filing Entity: SipSuperior LLC

FCC Registration Number (FRN): 0038734133

EIN: 42-4206923

Business Address: 13820 NE Airport Way, Portland, OR 97251-1158

Jurisdiction of Formation: Wyoming, USA

1. Overview

SipSuperior LLC ("SipSuperior" or "the Company") is a newly formed Wyoming limited liability company that provides SIP trunking services to business customers in the United States. SipSuperior does not own, lease, or operate telecommunications network switching, routing, or call-signaling infrastructure. SipSuperior operates as a non-facilities-based reseller, provisioning voice service to its customers entirely through a wholesale arrangement with an upstream, FCC-registered voice service provider (the "Underlying Carrier") that owns and controls the network infrastructure over which calls are originated, and that has implemented the STIR/SHAKEN caller ID authentication framework in compliance with 47 CFR Part 64, Subpart O.

SipSuperior does not hold a Service Provider Code (SPC) token from the STI Policy Administrator and does not independently sign or verify caller identification information. Accordingly, SipSuperior lacks control over the network infrastructure necessary to implement the STIR/SHAKEN authentication framework and has no implementation obligation under 47 CFR §§ 64.6301(a), 64.6302(c)-(d). SipSuperior certifies under Option 3 of its Robocall Mitigation Database filing (No STIR/SHAKEN Implementation) and, consistent with 47 CFR § 64.6305(a) and (d), has adopted and implemented the robocall mitigation program described below, applicable to all calls SipSuperior originates on its network.

2. Know Your Customer (KYC) Procedures

Before provisioning service, SipSuperior requires all prospective customers to provide: (a) legal business name and, where applicable, business registration or formation

documentation; (b) a valid contact name, telephone number, and email address; and (c) a description of the intended use case for the requested telephone service. SipSuperior reviews this information prior to activating service and reserves the right to request additional documentation or decline service to any applicant whose stated use case, expected calling patterns, or other characteristics are consistent with unlawful robocalling or caller ID spoofing activity. This review is repeated for renewing customers whose calling activity or account status changes materially.

3. Know-Your-Upstream-Provider Procedures

SipSuperior's policy is to provision its underlying network capacity, origination, and termination services only from an upstream wholesale carrier that SipSuperior has confirmed: (a) maintains a current, active filing in the FCC's Robocall Mitigation Database; (b) has implemented STIR/SHAKEN authentication across its network in compliance with 47 CFR § 64.6301; and (c) has no known Commission enforcement actions related to illegal robocall or spoofing traffic. SipSuperior will periodically reconfirm its Underlying Carrier's Robocall Mitigation Database status for as long as the relationship continues, and will discontinue routing traffic through any upstream provider that is removed from the Database or becomes subject to a Commission enforcement action for illegal robocall traffic.

4. Ongoing Monitoring and Call Analytics

SipSuperior monitors customer calling activity for patterns commonly associated with illegal robocalling or spoofing, including abnormally high call volumes, abnormally short call durations, high rates of unanswered or immediately terminated calls, and complaints received directly by SipSuperior or forwarded from its Underlying Carrier, the Commission, or the Industry Traceback Group. This monitoring is performed using call detail record (CDR) reporting and usage-analytics tools made available through SipSuperior's Underlying Carrier's platform and SipSuperior's own customer account and billing systems; SipSuperior does not currently use a dedicated third-party call analytics vendor separate from these tools. Where suspicious patterns are identified, SipSuperior will investigate and may suspend or terminate the originating customer's service pending the outcome of that investigation.

5. Contractual Prohibitions

SipSuperior's Terms of Service and Acceptable Use Policy, to which all customers must agree before activating service, expressly prohibit the use of SipSuperior's service to originate illegal robocalls, unlawfully spoof caller identification information, or otherwise violate the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, or any other applicable law or Commission rule. Violation of these terms is grounds for immediate suspension or termination of service, at SipSuperior's discretion.

6. Traceback Cooperation

SipSuperior commits to responding fully, and within 24 hours, to all traceback requests received from the Commission, law enforcement, and the industry traceback consortium (USTelecom's Industry Traceback Group), and to cooperating fully with such entities in investigating and stopping illegal robocallers using SipSuperior's service to originate calls.

7. Reliance on Underlying Carrier Authentication

SipSuperior's policy is to contract only with an Underlying Carrier that is an FCC-registered voice service provider, has implemented STIR/SHAKEN across its network in compliance with 47 CFR § 64.6301, and is itself listed in the Commission's Robocall Mitigation Database. SipSuperior relies on this upstream authentication as its primary layer of protection against spoofed caller identification information, while independently applying the Know Your Customer, know-your-upstream-provider, monitoring, and enforcement measures described in Sections 2 through 5 above at the reseller level.

8. Point of Contact

Questions regarding SipSuperior's robocall mitigation program, and all traceback requests, should be directed to:

Zachary D. Christopherson, Owner
SipSuperior LLC
13820 NE Airport Way, Portland, OR 97251-1158
Phone: (404) 647-6110
Email: info@sipsuperior.com

9. Certification Basis

This Robocall Mitigation Program Description is submitted in connection with SipSuperior LLC's certification as a Voice Service Provider without a STIR/SHAKEN obligation, under 47 CFR § 64.6305(d), Option 3 (No STIR/SHAKEN Implementation), filed in the Federal Communications Commission's Robocall Mitigation Database. SipSuperior lacks the network infrastructure and technical capability necessary to independently implement the STIR/SHAKEN authentication framework, as described in Section 1 above. *See* Call Authentication Trust Anchor, Second Report and Order, 36 FCC Rcd 1859, 1868, para. 19 (2020).

Prepared for filing by SipSuperior LLC. This description is subject to the certifying officer's review and personal attestation, made under penalty of perjury, at the time of submission to the FCC Robocall Mitigation Database.