

ROBOCALL MITIGATION PROGRAM DESCRIPTION

SS 786 LLC

Voice Service Provider / Non-Facilities-Based VoIP Reseller

Underlying voice service provider: VoIP.ms

Purpose. This document describes the specific robocall mitigation practices adopted by SS 786 LLC for its role as an end-user-facing voice service provider and VoIP reseller. The program is designed to prevent SS 786 LLC services from being used to originate illegal calls, support rapid traceback, and document the company's customer and upstream-provider diligence.

1. Provider Profile and Scope

SS 786 LLC provides or intends to provide interconnected VoIP services to end-user business customers through a resale arrangement. SS 786 LLC does not operate its own underlying carrier network, switching network, or STIR/SHAKEN signing infrastructure. Its underlying voice service provider is VoIP.ms. This mitigation program applies to outbound calling activity originated by SS 786 LLC end-user customers using services provisioned through SS 786 LLC.

SS 786 LLC treats robocall mitigation as an ongoing compliance function. The company will review and update this program when its services, network relationships, risk profile, or applicable legal requirements materially change.

2. STIR/SHAKEN Status and Network-Control Limitation

SS 786 LLC has not implemented STIR/SHAKEN on any portion of a network that it owns or controls. SS 786 LLC is a non-facilities-based reseller and lacks control over the network infrastructure necessary to perform STIR/SHAKEN implementation itself, including the underlying carrier switching/signing infrastructure and certificate-based authentication functions. This lack-of-control explanation is provided pursuant to 47 CFR § 64.6305(d)(2)(i).

VoIP.ms publicly states that it signs outbound calls from U.S. telephone numbers using its own STIR/SHAKEN certificate. SS 786 LLC does not represent that authentication performed by VoIP.ms constitutes SS 786 LLC's own STIR/SHAKEN implementation. SS 786 LLC will provide accurate information in its RMD certification regarding its own implementation status and will update that filing if its technical role changes.

3. Know-Your-Customer (KYC) and Customer Onboarding

SS 786 LLC has adopted affirmative customer-vetting procedures intended to prevent new and renewing customers from using the service to originate illegal calls. Before enabling outbound calling, SS 786 LLC will collect and review information sufficient to identify the customer and understand the intended use of the service.

3.1 Information collected and reviewed

- Customer legal name and, for a business, business or trade name.
- Physical service or business address and billing address, when different.
- Telephone number, email address, and the name of a responsible individual authorized to act for the customer.
- For business customers, reasonable evidence of business existence when warranted, such as state registration information, a business website, or other reliable public/business records.
- The intended use of the voice service, expected users, anticipated outbound call volume, and whether the customer intends to use automated dialing, call-center, telemarketing, lead-generation, polling, debt-collection, or similar high-volume calling.
- Information necessary to verify that the customer is authorized to use any caller ID number presented on outbound calls.

3.2 Risk-based verification and activation

SS 786 LLC will compare customer-provided information for internal consistency and may request additional documentation when information cannot be reasonably verified, the requested service presents elevated risk, or the customer seeks unusually high outbound call capacity. Elevated-risk accounts may be subject to delayed activation, lower calling limits, additional identity/business verification, or denial of service.

SS 786 LLC will not knowingly activate or continue service for a customer whose identity cannot reasonably be established, whose proposed use is unlawful, or whose conduct presents unresolved indicators of illegal calling or spoofing.

4. Caller ID, Numbering, and Spoofing Controls

- Customers may use only caller ID numbers assigned through the service or other numbers for which SS 786 LLC has a reasonable basis to believe the customer is authorized to use.
- SS 786 LLC prohibits customers from falsifying caller ID information or impersonating another person, business, government entity, financial institution, or other organization.
- Requests to use external caller ID numbers may be restricted or require verification before use.
- If SS 786 LLC becomes aware that a customer is presenting an unauthorized or suspicious caller ID, SS 786 LLC will restrict the affected calling configuration and investigate before restoring access.
- SS 786 LLC will cooperate with VoIP.ms regarding caller-ID validation, call authentication, blocking, and other network-level controls that are not technically controlled by SS 786 LLC.

5. Prohibited Uses and Customer Compliance Controls

SS 786 LLC prohibits use of its voice service for illegal robocalls, unlawful spoofing, scams, fraud, harassment, or calls that violate applicable federal or state law. Customers are expected to obtain any legally required consent and comply with applicable calling, telemarketing, Do-Not-Call, caller-ID, and consumer-protection requirements.

Customers seeking to use the service for telemarketing, automated dialing, call-center, polling, collection, or similar traffic must disclose that use. Where VoIP.ms requires pre-authorization for telemarketing or other traffic categories, SS 786 LLC will require the necessary upstream approval before permitting that use. SS 786 LLC may refuse, limit, suspend, or terminate service when the customer does not provide requested compliance information or when continued service would create an unreasonable risk of illegal calling.

6. Traffic Monitoring, Analytics, and Red-Flag Review

SS 786 LLC does not currently operate a separate proprietary or third-party automated robocall analytics platform. SS 786 LLC performs account-level monitoring and manual review using service usage and call-detail information available to it through its reseller relationship. For network-level analytics, blocking, and carrier controls, SS 786 LLC relies on its underlying provider, VoIP.ms, to the extent those functions are provided on the upstream network.

SS 786 LLC will investigate available information when it observes or receives notice of red flags, including:

- A sudden or unexplained increase in outbound call volume.
- A high proportion of very short-duration or unanswered outbound calls inconsistent with the customer's stated business use.
- Repeated changes or rotation of caller ID numbers without a legitimate explanation.
- Complaints, carrier blocking/spam-label reports, traceback requests, or notices from VoIP.ms, the FCC, law enforcement, or the Industry Traceback Group.
- Calling patterns inconsistent with the customer's disclosed purpose, geographic market, or expected volume.
- Customer identity, business, payment, or contact information that becomes inconsistent, unreachable, or otherwise suspicious.
- Attempts to evade limits, caller-ID controls, prior suspensions, or compliance inquiries.

Depending on the facts, responsive action may include contacting the customer, obtaining additional documentation, restricting outbound calling, reducing calling limits, disabling a caller ID or DID, suspending service, terminating service, preserving records, and coordinating with VoIP.ms or appropriate authorities.

7. Response to Suspected Illegal Traffic

When SS 786 LLC receives credible information identifying suspected illegal traffic associated with a customer account, it will promptly investigate the available account and call information. SS 786 LLC will take action proportionate to the risk and the information available, including restricting or suspending the relevant customer traffic while the matter is investigated when appropriate.

If SS 786 LLC receives a formal FCC Notification of Suspected Illegal Traffic or another binding regulatory directive, SS 786 LLC will follow the applicable requirements of 47 CFR § 64.1200(n), including investigating the identified traffic, reporting as required, ceasing or blocking identified and substantially similar illegal traffic to the extent applicable to its role, and coordinating with VoIP.ms where network-level action is required.

8. Traceback Response and Cooperation

SS 786 LLC commits to respond fully within the time required by 47 CFR §§ 64.6305(a)(2) and 64.1200(n)(1) to traceback requests from the FCC, civil or criminal law enforcement, and the registered industry traceback consortium. SS 786 LLC will cooperate with those entities in investigating and stopping illegal robocallers that use its service to originate calls.

Upon receipt of a traceback request, SS 786 LLC will identify the relevant customer/account and available call records, determine the upstream routing information available to it, respond with accurate information within the required timeframe, preserve relevant records, and promptly contact VoIP.ms when upstream information or network action is needed. The company will maintain a monitored contact method for robocall-mitigation matters as identified in its RMD filing.

9. Know-Your-Upstream-Provider Procedures

SS 786 LLC's current underlying voice service provider is VoIP.ms. SS 786 LLC will exercise reasonable due diligence regarding its upstream provider relationship, including maintaining current business/contact information, reviewing applicable provider terms and compliance requirements, and confirming, as applicable, that the provider maintains an RMD filing that appears in the FCC database and has not been removed by Commission action.

SS 786 LLC will not knowingly use an upstream provider to carry or process a high volume of illegal traffic. If credible information indicates that an upstream provider relationship presents a material illegal-call risk, SS 786 LLC will investigate, communicate with the provider, and modify or terminate the relationship when necessary to remain compliant.

10. Do-Not-Originate (DNO) and Blocking Coordination

SS 786 LLC will take reasonable steps within the capabilities it controls to prevent customer origination using numbers that should not originate calls. If SS 786 LLC receives a credible request or notice that a number should not be used for outbound origination, it will restrict customer authorization to present that number and coordinate with VoIP.ms regarding any network-level blocking or DNO action required under 47 CFR § 64.1200(o).

11. Recordkeeping, Complaints, and Program Review

- SS 786 LLC will maintain customer onboarding and verification information, service/account records, compliance communications, and available call-detail information for a period reasonably sufficient to support investigations, tracebacks, disputes, and applicable legal obligations.
- Robocall, spoofing, spam-labeling, or fraud complaints associated with a customer will be documented and reviewed for patterns or recurring risk.
- Material compliance incidents and enforcement or traceback communications will be escalated to the company officer or responsible individual identified in the RMD filing.
- SS 786 LLC will periodically review whether its KYC, monitoring, caller-ID, and suspension procedures remain effective and will strengthen them when experience or regulatory guidance shows that changes are needed.
- SS 786 LLC will update its RMD filing within the applicable FCC deadline when required information changes and will complete required annual recertification.

12. Responsible Compliance Contact

The individual identified by SS 786 LLC in its Robocall Mitigation Database filing as responsible for robocall-mitigation matters is responsible for receiving traceback requests, regulatory notices, and escalated customer-abuse matters; coordinating responses with VoIP.ms; and overseeing updates to this program.

13. Program Adoption and Commitment

SS 786 LLC adopts this Robocall Mitigation Program as its operating policy for the voice services covered by this filing. The company commits to follow the practices described above, to take reasonable and effective steps to prevent its services from being used to originate illegal calls, to respond to traceback requests as required, and to cooperate with the FCC, law enforcement, the Industry Traceback Group, and its underlying provider in investigating and stopping illegal robocalling activity.

This description is intended to accurately describe SS 786 LLC's current reseller model. If SS 786 LLC later acquires or controls network infrastructure, obtains its own STIR/SHAKEN certificate, changes upstream providers, begins using a separate analytics vendor, or materially changes its customer or traffic profile, it will review this program and make any required updates to its RMD filing.

Regulatory References

- 47 CFR § 64.6305(a) and (d) - Robocall mitigation program and RMD certification requirements for voice service providers.
- 47 CFR § 64.1200(n)(1), (2), (4), and (5) - traceback response, suspected illegal traffic, KYC/customer diligence, and upstream-provider diligence.
- 47 CFR § 64.1200(o) - reasonable Do-Not-Originate blocking requirements.
- FCC 23-18, Sixth Report and Order (2023) - application of mitigation and RMD filing obligations to providers, including resellers that lack facilities necessary to implement STIR/SHAKEN.
- DA 26-72, Appendix A, RMD Frequently Asked Questions for Filers (updated January 20, 2026).

Filing accuracy: This program description should be submitted only while it accurately reflects SS 786 LLC's actual operating procedures and service arrangement.