



## ALVEUS LIMITED

Company Number: 13848036 · FCC Registration Number:  
0038799482

45 Frederick  
Street  
Birmingham  
B1 3HN  
United Kingdom

FILED PURSUANT TO 47 CFR § 64.6305(A)

# Robocall Mitigation Plan

REDACTED COPY FOR PUBLIC INSPECTION

Provider classification

**Foreign Voice Service Provider (United Kingdom)**

Version

**1.0**

Date

**14 August 2026**

## 1. Purpose and Scope

This document sets out the robocall mitigation program operated by Alveus Limited ("Alveus") in respect of all voice traffic it originates that terminates within the United States.

Alveus operates a hosted outbound dialling platform used by business customers. This plan describes the steps Alveus takes to avoid originating illegal robocall traffic, the controls it applies to calling line identification, its cooperation with traceback authorities, and the action it takes against customers found to be originating unlawful traffic.

This plan applies to every customer, every trunk and every call originated on the Alveus platform. No customer or traffic class is exempt.

## 2. Statement of Policy

Alveus operates a zero tolerance policy toward fraud, illegal robocalling and unauthorised or spoofed calling line identification.

The policy is implemented through technical controls at the switch that prevent a customer presenting calling line identification it has not been authorised to use, through contractual prohibition, and through suspension of any customer found to be in breach. A customer generating illegal traffic is removed from the platform.

Alveus recognises that as an originating provider it occupies the position in the call path where illegal traffic can most effectively be identified and stopped, and accepts that responsibility.

### 3. Customer Due Diligence

No customer is provisioned with an outbound trunk before completing onboarding verification. Alveus verifies the following as a minimum.

**Legal identity of the entity.** Company registration number verified against the relevant national register, being Companies House for United Kingdom entities or the equivalent register in the customer's jurisdiction, together with registered address.

**Identity of the contracting individual.** Verified identity document for the director, officer or authorised signatory entering into the agreement.

**Nature of the business and intended use.** The customer must describe the campaigns it intends to run, the industry in which it operates, and the source of the data it will dial.

**Consent basis.** The customer must state the lawful basis on which it holds contact data, confirm that it maintains records of consent, and confirm compliance with the Telephone Consumer Protection Act and applicable state law for any traffic terminating in the United States.

**Calling line identification.** The numbers the customer intends to present and its right to use them, as set out in section 4.

Onboarding records are retained for the duration of the customer relationship and for 24 months thereafter, and are available to the Commission, law enforcement and the industry traceback consortium on request.

### 4. Calling Line Identification Controls

Alveus applies technical restriction at the switch on the calling line identification a customer may present.

#### 4.1 Default position

Customers may present only calling line identification allocated to them by Alveus, or numbers Alveus has itself obtained and assigned. Traffic presenting any other value is rejected at the switch.

## 4.2 Customer provided calling line identification

Where a customer wishes to present calling line identification it holds independently of Alveus, that capability is restricted and is not enabled by default. It requires explicit whitelisting.

The whitelisting process operates as follows.

1. The customer submits each number or number range it wishes to present, together with evidence of its right to use it. Acceptable forms of evidence are specified in the unredacted copy. **REDACTED**
2. Alveus reviews the submission before any number is enabled. Numbers are not whitelisted on request alone.
3. An outbound test call is placed to verify connectivity and to confirm that the calling line identification presented on the wire matches the value authorised. The number is not released for production traffic until this test has been completed and the presented value verified.
4. Only the specific numbers or ranges verified are added to the customer's permitted set. The permitted set is enforced at the switch. Any value outside it is blocked at call setup.

Customer provided calling line identification is therefore a limited, evidenced and individually approved capability. A customer cannot self provision it, and cannot present a number by configuring it within its own dialler.

## 4.3 Ongoing review

Alveus reviews the calling line identification presented on its switch daily, rather than relying on customer declarations. The review is automated. Alveus operates a system that checks presented values against each customer's authorised set and flags any value falling outside it. **REDACTED**

A flagged value is raised automatically as a ticket for the Alveus support team, which investigates the origin of the presentation, establishes whether the customer holds any right to the number, and determines whether the presentation was a configuration error or a deliberate attempt to present unauthorised calling line identification. Investigation of a flagged value takes priority over routine support work.

The review identifies:

- values presented that fall outside a customer's authorised set
- presentation of numbers that do not conform to a valid format for the destination

- variation in presented numbers across a campaign consistent with number rotation used to evade call blocking and labelling

This automated review operates alongside, and as a check upon, the authorised caller ID enforcement described at section 4.2. Enforcement at the switch is the primary control. The daily review exists to confirm that enforcement is operating as intended and to capture any presentation that enforcement did not prevent.

Whitelisting authority is withdrawn where a customer presents a number outside its permitted set, or where evidence supplied in support of a number is found to be inaccurate.

## 5. Traffic Monitoring

Alveus operates a proprietary monitoring system **REDACTED** which observes originated traffic in near real time and identifies campaigns whose characteristics are consistent with illegal robocalling.

The system measures average call duration and answer seizure ratio at customer, campaign and trunk level, and compares observed values against expected ranges for legitimate business calling. Traffic exhibiting characteristics consistent with mass unsolicited dialling against non consented lists is flagged for investigation. Alert thresholds are specified in the unredacted copy. **REDACTED**

The indicators monitored include:

- average call duration below expected levels combined with high call volume
- sustained low answer seizure ratio across a campaign
- step changes in a customer's volume inconsistent with its declared business
- dialling concentrated against sequential number ranges
- calling outside permitted hours for the destination jurisdiction

Where the monitoring system identifies a concern, the campaign is investigated before it continues and the customer is required to evidence the consent basis for the traffic in question.

Where Alveus has reason to suspect fraud or illegitimate use of its systems, its terms of service permit it to review call recordings. This allows Alveus to establish the actual content and purpose of calls being originated, rather than

relying on signalling data or customer representations alone. Recordings are reviewed only where such suspicion exists. Details of the review procedure are specified in the unredacted copy. **REDACTED**

## 6. Response to Traceback Requests

Alveus commits to respond fully and within 24 hours to all traceback requests received from the Federal Communications Commission, law enforcement and the industry traceback consortium, and to cooperate fully with those entities in investigating and stopping any illegal robocaller using its service to originate calls.

This commitment is supported by the following.

A named point of contact with a monitored mailbox, and a named deputy, so that requests are actioned within 24 hours including during periods of absence.

Call detail record retention sufficient to identify, for any call referenced in a traceback, the originating customer, the trunk used, the calling line identification presented, the destination and the timestamp. Records are retained for **24 months**.

The ability to identify the responsible customer for any originated call, and to provide that customer's verified identity and onboarding information to the requesting authority.

### ROBOCALL MITIGATION POINT OF CONTACT

**Isaac Hussain**, Escalations Manager

[escalations@alveusco.com](mailto:escalations@alveusco.com)

+44 121 630 1602

### NAMED DEPUTY

**Samuel Abelneh**, Compliance Officer

[escalations@alveusco.com](mailto:escalations@alveusco.com)

+44 121 630 1602

## 7. Enforcement

Where Alveus determines that a customer has originated illegal traffic, presented unauthorised calling line identification, or provided false information during onboarding or whitelisting, Alveus will:

1. **Suspend** the customer's outbound capability on identification, without prior notice, where the evidence indicates ongoing illegal traffic.
2. **Investigate**, requiring the customer to produce evidence of consent and of its right to the calling line identification presented.
3. **Terminate** the customer where illegal traffic is confirmed, or where the customer fails to produce satisfactory evidence.
4. **Retain and provide** records to the Commission, law enforcement or the traceback consortium as required.

Alveus does not re-provision a terminated customer under a new entity or trading name, and checks new applications against records of prior terminations.

## 8. Contractual Provisions

Use of the Alveus dialling platform is governed by the 626 Dialler Terms of Use and Acceptable Use Agreement, published at [alveusco.com](https://alveusco.com) and incorporated into every customer contract.

That agreement permits use of the platform only where calls are placed by verified businesses or lawful entities, for a legitimate, lawful and transparent purpose, and where the recipient has provided valid prior opt-in or express consent or may otherwise be lawfully contacted under the law of both the originating and destination jurisdictions. Customers must comply with all applicable law in every jurisdiction involved, including the telecommunications, consumer protection and marketing law of the destination country.

The agreement expressly prohibits customers from using the platform for:

- spam, robocalling, unlawful cold calling or nuisance traffic
- fraud, phishing, scams, impersonation or misleading practices
- unlawful caller identification manipulation, circumvention of telecommunications regulation, or routing traffic to evade compliance or enforcement
- harassment, coercion, intimidation or abuse
- any activity infringing the rights, privacy or safety of individuals or organisations

Customers are solely responsible for maintaining lawful consent records, for holding legal authority to place calls, and for compliance in every jurisdiction involved. On reasonable request a customer must promptly provide evidence of its opt-in or

lawful basis for contact, its business verification and identity details, and its internal compliance, suppression and opt-out procedures. This obligation enables Alveus to substantiate the origin and lawful basis of any call identified in a traceback.

Alveus reserves the right to verify customer identity, business legitimacy and usage patterns, and to investigate call content where required by law, where regulatory risk arises, or where credible allegations of misuse are received.

Alveus may suspend or terminate the Services immediately and without liability where the customer is in breach, where regulatory, reputational or legal risk is identified, or where Alveus reasonably believes the Services are being used for fraudulent, unlawful, abusive or non-compliant activity. Suspension does not require prior notice.

## **9. STIR/SHAKEN Status**

Alveus has not implemented the STIR/SHAKEN authentication framework on any portion of its network. As a foreign provider, Alveus does not presently hold a Service Provider Code token from the Policy Administrator and accordingly does not hold an STI certificate with which to sign calls.

Alveus is pursuing implementation. It has obtained its FCC Registration Number, has executed an interconnection agreement with a United States carrier, and is progressing its Form 499-A registration and Operating Company Number application, both of which are prerequisites to obtaining a Service Provider Code token. On assignment of a token and issuance of a certificate, Alveus will implement authentication and update this filing accordingly.

Pending implementation, the controls described in sections 3 to 8 constitute the reasonable steps Alveus takes to avoid originating illegal robocall traffic.

## **10. Governance and Review**

This plan is reviewed at least annually and on any material change to the Alveus platform, its customer base or applicable regulation. Responsibility for the plan sits with Isaac Hussain, Escalations Manager.

Alveus will update its filing in the Robocall Mitigation Database within 10 business days of any change to the information submitted, and will recertify annually as required.

---

Alveus Limited certifies that the information in this plan is accurate, true and correct.

Signature: \_\_\_\_\_

**Isaac Hussain**

Escalations Manager

14 August 2026