

Robocall Mitigation Database Filing

Robocall Mitigation Plan Summary:

ConsumersCall LLC is a voice service provider registered with the FCC but does not currently originate any voice traffic to the United States public switched telephone network (PSTN). No traffic will be initiated or passed to downstream U.S. providers until full STIR/SHAKEN implementation is complete, including acquisition of the Service Provider Code (SPC) token and certificate enrollment.

As such, no robocall mitigation is necessary at this time. ConsumersCall LLC is committed to maintaining compliance with the FCC's rules under 47 CFR § 64.6305. Once our STIR/SHAKEN deployment is finalized and prior to initiating U.S. traffic, we will update our RMD filing and revise this mitigation plan accordingly.

Robocall Mitigation Readiness and Practices:

Although we are not currently originating U.S. traffic, we have prepared the following internal procedures to be enforced at launch:

1. Know Your Customer (KYC):

- All clients will be required to complete identity verification, traffic profile disclosure, and provide attestation against the origination of illegal robocalls.

2. Fraud Monitoring Systems:

- Real-time monitoring systems will be deployed to detect high-risk traffic behaviors such as short-duration or high-volume calls.
- In-house analytics and third-party tools will be used to ensure compliance.

3. Do-Not-Originate (DNO) Protections:

- Our systems will incorporate DNO lists to block known invalid or spoofed number ranges.

4. Traffic Enforcement Policies:

- We maintain a zero-tolerance policy toward non-compliant clients.
- Violations of our traffic policies will result in immediate investigation and potential termination.

5. STIR/SHAKEN Implementation Status:

- ConsumersCall LLC is actively completing the STIR/SHAKEN onboarding process, including:

- FRN and 499 Filer ID registration
 - SPC token application
 - Certificate Authority (CA) enrollment
 - Technical integration with production signing platform
- No U.S. call traffic will begin until this implementation is complete.

Robocall Mitigation Plan Type:

No traffic until STIR/SHAKEN implementation is complete

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