

Robocall Mitigation Plan

Filer: Rozmo LLC **FCC Registration Number (FRN):** 0038864617

Robocall Mitigation Point of Contact:

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1. Provider Description and Role

Rozmo LLC ("Rozmo") is a provider of multi-tenant hosted VoIP / UCaaS services. Rozmo operates a FreeSWITCH-based softswitch platform (fsPBX) hosted on cloud infrastructure and provides originating and terminating voice service to business end-user customers in the United States. Rozmo originates SIP-based voice traffic to the public switched telephone network (PSTN) through one or more upstream interconnected voice service providers and carriers.

For purposes of this filing, Rozmo operates as a **voice service provider** with respect to the calls it originates on behalf of its end-user customers.

2. STIR/SHAKEN Implementation

Rozmo delivers all of the traffic it originates to the PSTN through its interconnected upstream voice service provider, which performs STIR/SHAKEN caller ID authentication on that traffic. Rozmo does not maintain its own Secure Telephone Identity (STI) certificate; the calls Rozmo originates are authenticated and signed by its upstream provider, which acts as the originating provider of record and assigns the applicable attestation level and PASSporT for each call.

Within its own IP-based network, Rozmo:

- Uses encrypted SIP signaling (SIPS/TLS) and encrypted media (SRTP) throughout its platform, including on the external SIP profile used for all remote endpoints and trunks.
- Presents only telephone numbers that have been assigned to, or verified for, its customers by its number provider, so that its upstream provider can apply the appropriate attestation.
- Does not alter or strip Identity (PASSporT) headers on authenticated calls.

Because Rozmo relies on its interconnected provider for STIR/SHAKEN authentication rather than signing traffic with its own certificate, Rozmo's obligations under the Commission's rules

are satisfied through the robocall mitigation program described in Section 3, which applies across all of the traffic Rozmo originates.

3. Robocall Mitigation Practices

Independent of, and in addition to, STIR/SHAKEN, Rozmo maintains the following practices reasonably designed to prevent the origination of illegal robocalls on its network:

3.1 Know Your Customer (KYC) and Onboarding

- Rozmo collects and verifies identifying information for each business customer prior to activation, including legal business name, physical address, responsible contact, and the intended use of the service.
- Rozmo assigns or verifies the telephone numbers each customer is authorized to use and does not knowingly permit customers to originate calls using numbers they have no right to use.
- Acceptable-use terms prohibiting illegal robocalling, unlawful spoofing, and originating traffic on behalf of unknown third parties are incorporated into each customer agreement.

3.2 Traffic Monitoring and Anomaly Detection

- Rozmo monitors call detail records and platform telemetry for indicators of illegal or abusive calling, including abnormal call volumes, high short-duration-call ratios, low answer-seizure ratios, sequential-number dialing patterns, and sudden spikes in traffic from a single customer or trunk.
- Rozmo reviews traceback requests and downstream carrier alerts as an additional signal of potentially illegal traffic.

3.3 Response and Enforcement

- Upon identifying traffic reasonably suspected to be illegal, Rozmo will investigate promptly and take proportionate action, up to and including rate-limiting, blocking the offending numbers or trunks, and suspending or terminating the responsible customer's service.
- Customer agreements reserve Rozmo's right to suspend or terminate service for violations of the acceptable-use terms or applicable law.

3.4 Industry Traceback Cooperation

- Rozmo will respond fully and in a timely manner to all traceback requests from the Industry Traceback Group (ITG) or its successor and will cooperate with the FCC, law enforcement, and other authorities investigating suspected illegal robocall campaigns.

- Rozmo maintains the point-of-contact information above for the receipt of traceback and enforcement communications and keeps that information current in the Robocall Mitigation Database.

3.5 Recordkeeping

- Rozmo retains call detail records and relevant customer onboarding records for a period sufficient to support traceback, investigation, and regulatory compliance.

4. Certification and Contact

Rozmo certifies that it has instituted the robocall mitigation practices described in this plan and that it will respond to traceback requests and cooperate in investigating and stopping illegal robocallers. Questions regarding this plan may be directed to the Robocall Mitigation Point of Contact identified above.