

Robocall Mitigation Plan — Marketstead LLC

Filing entity: Marketstead LLC · FCC Registration Number 0038866059

Provider type: Voice Service Provider (non-facilities-based reseller)

Robocall mitigation contact: As provided in the accompanying Robocall Mitigation Database filing for FRN 0038866059

Date: September 9, 2026, filed pursuant to 47 CFR § 64.6305

1. Service Description

Marketstead LLC ("Marketstead") is a non-facilities-based reseller of interconnected voice and messaging services. Marketstead provides a business communications platform (telephone lines, voicemail, and text messaging) to small-business subscribers ("tenants") under written service agreements. All call origination, transport, and telephone-number operations are performed through upstream wholesale carriers; Marketstead itself owns no transmission facilities. While the Marketstead software platform accepts public self-service account signup, voice and messaging services are activated only after the account holder (i) establishes a paid subscription through a third-party payment processor and (ii) completes the payment processor's identity verification of the account holder. Activation is fully automated; no voice or messaging capability can be obtained anonymously, without payment, or without verified identity. Every tenant that obtains voice service is therefore individually identified, contracted, and provisioned.

2. Practices to Prevent the Origination of Illegal Robocall Traffic

Marketstead's mitigation program rests on knowing who its customers are, contractually prohibiting unlawful calling, and enforcing those prohibitions technically.

(a) Subscriber accountability and attribution. Voice and messaging service is activated only for tenants that have (i) established a paid subscription through a third-party payment processor, which independently verifies the payment instrument and associated account details, and (ii) completed the payment processor's know-your-customer identity verification. Activation is fully automated — the platform performs these checks without human intervention, and no voice or messaging capability is available to anonymous, unverified, or non-paying accounts. Each provisioned tenant account is individually attributable: Marketstead retains the account name, billing

identity, and contact information associated with every telephone number and line it provisions, and can identify the responsible tenant account for any originated call or message from its own records. Marketstead will implement additional subscriber verification measures as its subscriber base grows and intends to complete formal know-your-customer review of business identity for voice-enabled tenants before reaching material call volume.

(b) Contractual prohibitions. Each tenant agreement expressly prohibits: initiating unlawful robocalls; using auto-dialers, predictive dialers, or artificial/prerecorded voice without lawful consent; transmitting misleading or inaccurate caller ID information; and any use of the service that violates the Communications Act, the Commission's rules, the Telemarketing Sales Rule, or state law.

(c) Technical enforcement. Marketstead's platform enforces these prohibitions in software rather than relying on policy alone:

- **Consent-based messaging.** Outbound marketing text messages are permitted only to recipients with a recorded, evidence-backed opt-in (timestamp, source, and consent artifact retained). Recipient opt-out ("STOP") requests are honored immediately and unconditionally.
- **Do-not-call suppression.** A per-tenant do-not-call suppression list is enforced on every outbound marketing transmission regardless of consent status. National do-not-registry screening is integrated at the same layer and will be activated in advance of any telemarketing use of the platform.
- **Fail-closed send gates.** A message or call that fails the platform's consent or suppression checks cannot be transmitted: the platform refuses the request before any request is made to the carrier network. Compliance is enforced by the platform's architecture, not by after-the-fact review.
- **Fraud and abuse controls.** The voice platform applies destination screening (including blocking of premium-rate and known-fraud destination patterns). Message and call volume is billed under each tenant's service plan, and a tenant-level suspension control can halt all of a noncompliant tenant's outbound traffic immediately.

(d) No automated calling or dialer platform features. Marketstead does not offer automated outbound calling, predictive dialing, bulk voice calling, or broadcast voice of any kind. The platform provides human-initiated click-to-call from its customer-

management interface: every outbound call requires a user to initiate it individually. An inbound AI receptionist answers calls placed to a tenant's business line and can capture an order; it does not place outbound calls. All voice traffic originates from individual business lines used by named tenants for ordinary business communications with their own customers.

3. Monitoring, Detection, and Investigation

Marketstead maintains operational analytics over calling and messaging activity, bills message and call volume under per-tenant service plans, and receives and reviews consumer complaints through a dedicated complaint intake form and a monitored abuse email address, both of which create tracked support tickets subject to a 24-hour response service level. Complaints are investigated against the originating tenant using retained call-detail records. Marketstead is deploying additional automated screening — including short-call ratio and destination-mix anomaly detection — as its traffic grows.

4. Response to Illegal Traffic and Enforcement Against Tenants

Upon detection of, or notice regarding, suspected illegal traffic originating from a Marketstead tenant, Marketstead will: (a) suspend the tenant's communications service, which the platform can effect immediately; (b) preserve all related call-detail and consent records; (c) investigate and cooperate fully with the upstream carrier, the Commission, and law enforcement; and (d) terminate the tenant relationship where unlawful conduct is confirmed. Suspension authority is technical and immediate; it does not depend on vendor intervention.

5. Traceback Cooperation — 24-Hour Response Commitment

Marketstead commits to **respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium**, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Marketstead retains call-detail records sufficient to identify the tenant account associated with any originated call and will provide that information to authorized traceback requesters within the committed window. Traceback and complaint correspondence is received via the dedicated complaint form and abuse email address identified in the Database filing, both of which create tracked tickets with a 24-hour response service level.

6. STIR/SHAKEN Posture

Rule basis (47 CFR § 64.6301): Marketstead LLC is a non-facilities-based reseller of interconnected voice service. All calls originated by Marketstead subscribers are originated and transmitted entirely on the internet Protocol networks of its upstream voice service providers; Marketstead owns and controls no IP network elements in the call path (no softswitches, session border controllers, or media gateways of its own). Because § 64.6301's implementation obligation applies to a voice service provider's own IP networks, that obligation does not attach to Marketstead under its current architecture; Marketstead registers as a voice service provider without a STIR/SHAKEN implementation obligation and files this plan pursuant to 47 CFR § 64.6305. (Note for the exemption field: § 64.6304(a) small-provider deadlines expired June 2023 and § 64.6306's certification window closed December 2020 — neither is claimed; the basis is § 64.6301's scope, not a codified exemption.)

Marketstead operates no SIP-signing infrastructure of its own. All calls originated by Marketstead subscribers are delivered to and authenticated by its upstream carrier's STIR/SHAKEN authentication service (STI-AS) prior to presentation to the public network; all originated traffic is signed by the carrier on Marketstead's behalf. Marketstead has been issued its own FCC Registration Number and intends to pursue independent Service Provider Manager registration to support direct attestation as its traffic grows.

7. Plan Maintenance

Marketstead will review this plan at least annually in connection with the Robocall Mitigation Database annual recertification (filing window February 1 – March 1), will update its filing within ten (10) business days of any change to contact information, and will revise the plan upon any material change to its network architecture or mitigation practices.

Declaration: I declare under penalty of perjury that I am authorized to submit this filing on behalf of Marketstead LLC and that the statements herein are true and correct.

Signature:  David Adams, Founder, Marketstead LLC

Date: 9/9/2026
