

SANVOICE, LLC

Robocall Mitigation Plan

Submitted pursuant to 47 C.F.R. § 64.6305 — Robocall Mitigation and Certification

1. Filer Information

Legal entity name	SanVoice, LLC (Florida limited liability company)
Business address	2767 SW Buckhart St, Port St Lucie, FL 34953
Website	www.sanvoice.com
FCC Registration Number	0038870309
Other business names currently in use (§ 64.6305(d)(4)(ii))	None.
All business names previously used (§ 64.6305(d)(4)(iii))	None. SanVoice, LLC has operated under no other name.
Foreign voice service provider (§ 64.6305(d)(4)(iv))	No. SanVoice, LLC is a Florida limited liability company.
Robocall mitigation contact — name, title, department	Peterson Pierre, President (sole officer; no departments)
Robocall mitigation contact — business address	2767 SW Buckhart St, Port St Lucie, FL 34953
Contact telephone	866.675.4775
Contact email	ppierre@sanvoice.com
Provider classification	Voice service provider without a STIR/SHAKEN implementation obligation (47 C.F.R. § 64.6305(d)(4)(vi)(C)); non-facilities-based interconnected VoIP
Operating Company Number	None. SanVoice does not hold an OCN.
Service status	Not yet commenced — no contract executed, no customer traffic carried as of this filing. This plan is filed in advance of SanVoice's first customer going live, consistent with 47 C.F.R. § 64.6305(a)(1) and (g)(1).

2. Description of Service and Network Role

SanVoice, LLC ("SanVoice") is a non-facilities-based provider of interconnected Voice over Internet Protocol service. SanVoice offers hosted PBX and cloud business telephone service to small and mid-size business end users, principally in the State of Florida. As of the date of this filing, SanVoice has not yet commenced service to any customer; this plan is filed in advance so that it is in place before SanVoice's first customer goes live, consistent with § 64.6305(a)(1)'s requirement that a robocall mitigation program be implemented, and with the fact that other providers may not lawfully accept traffic from a voice service provider that is not listed in the Robocall Mitigation Database under § 64.6305(g)(1).

Nature of SanVoice's administrative role. SanVoice provisions and administers customer telephone systems through VoIP.ms's multi-tenant hosted PBX platform, under a single master reseller account that SanVoice holds with VoIP.ms. Each SanVoice customer will be provisioned as a separate sub-account under that master account, and SanVoice's

President configures each sub-account's extensions, dial plan, auto-attendants, ring groups, and calling features using the web-based administrative interface that VoIP.ms makes available to its resellers for that purpose. SanVoice has no personnel other than its President; see Section 4.8.

SanVoice operates no network. The configuration described above is performed entirely through software that VoIP.ms provides and controls. SanVoice owns and operates no telecommunications switching equipment, no media servers, no session border controllers, no central office, and no call origination or termination facilities. SanVoice maintains no direct interconnection to the public switched telephone network and holds no Operating Company Number. SanVoice has no ability to inspect, route, block, or otherwise act upon call signaling or media in transit; every such function is performed on facilities owned, operated, and controlled exclusively by VoIP.ms.

All call origination, call termination, and PSTN interconnection for SanVoice customer traffic is performed by SanVoice's underlying wholesale carrier, VoIP.ms. SanVoice purchases SIP trunking, DID numbers, and voice origination and termination service from VoIP.ms on a wholesale basis, and offers hosted PBX and calling services to its own end-user customers under the SanVoice brand.

SanVoice is the provider of record to its end users. SanVoice does not rely upon, and does not assert reliance upon, any robocall mitigation plan filed by its underlying carrier. This plan describes SanVoice's own robocall mitigation program, applicable to SanVoice's own customers, as 47 C.F.R. § 64.6305(a)(1) requires of every voice service provider.

3. STIR/SHAKEN Implementation Certification

Certified implementation status: No Implementation.

Rule relied upon. SanVoice states, pursuant to 47 C.F.R. § 64.6305(d)(2)(i), that it is unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN.

3.1 Why the exemption applies to SanVoice

SanVoice's role in the call path is limited to configuring customer telephone features through software VoIP.ms provides. SanVoice owns no switch, media server, or SIP signaling infrastructure, and controls no network element on which a caller identification header could be signed or verified. The infrastructure on which STIR/SHAKEN authentication would have to be performed for SanVoice customer traffic is owned, operated, and controlled exclusively by VoIP.ms. SanVoice therefore cannot implement STIR/SHAKEN on any network, because it has no network on which to implement it.

The Commission has twice stated this exemption. In the order first adopting the STIR/SHAKEN implementation rules: “we clarify that the rules we adopt today do not apply to providers that lack control of the network infrastructure necessary to implement STIR/SHAKEN.” Call Authentication Trust Anchor, Report and Order, WC Docket No. 17-97, FCC 20-42, ¶ 40 (rel. Mar. 31, 2020). And in the order adopting rules governing third-party call authentication: “Providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN, such as switches for voice service in the IP portion of their network, are exempt from STIR/SHAKEN implementation requirements.” Call Authentication Trust Anchor, Eighth Report and Order, WC Docket No. 17-97, FCC 24-120, ¶ 8 (rel. Nov. 22, 2024).

SanVoice's administrative access to VoIP.ms's hosted PBX interface does not confer control over network infrastructure. The Commission addressed this directly: a facilities-based provider “cannot give control of its network infrastructure to a non-facilities-based provider ... by, for example, providing the non-facilities-based provider with access to software that enables them to enter attestations and certificate information for the purpose of authentication.” Enhancing Know-Your-Upstream-Provider Requirements and Strengthening STIR/SHAKEN, Notice of Proposed Rulemaking, FCC 26-32, 91 Fed. Reg. 42602, 42621 (July 9, 2026).

3.2 Bases SanVoice does not assert

- **SanVoice does not rely on 47 C.F.R. § 64.6304(b).** That provision exempts from § 64.6301 those voice service providers “that are incapable of obtaining an SPC token due to Governance Authority policy.” SanVoice does not assert that it is incapable of obtaining a Service Provider Code token, and does not assert that any lack of an Operating Company Number or of direct access to numbering resources bars it from obtaining one. SanVoice likewise does not rely on § 64.6304(a), the small voice service provider extension, which expired for non-facilities-based small voice service providers on June 30, 2022.
- **SanVoice does not rely on its size, or on its status as a reseller.** Neither is a basis for exemption under the Commission's rules, and SanVoice does not offer either as one.
- **SanVoice does not rely on authentication performed by any other provider.** SanVoice's underlying carrier performs STIR/SHAKEN authentication pursuant to that carrier's own obligation, not on SanVoice's behalf and not as a third party for SanVoice. SanVoice does not offer that fact as a basis for its certification. SanVoice's certification rests solely on its lack of control over the network infrastructure necessary to implement STIR/SHAKEN, as stated in Section 3.1.

3.3 The third-party authentication rules do not reach SanVoice

The Commission's rules governing the use of third parties to perform caller identification authentication, effective September 18, 2025, apply to voice service providers that bear an independent STIR/SHAKEN implementation obligation and that would otherwise satisfy that obligation using a third party's certificate. The Commission expressly declined to treat providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN as “originating service providers,” and thus as “first parties,” for purposes of those rules. FCC 24-120, ¶¶ 17-18 (rel. Nov. 22, 2024) (where a wholesale provider originates calls for an exempt reseller, the wholesale provider “is obligated to use STIR/SHAKEN to authenticate the caller ID pursuant to its own obligation under the Commission's rules, not as a third party for the reseller that is exempt”). SanVoice bears no independent implementation obligation, and those rules accordingly do not apply to SanVoice.

3.4 Pending rulemakings

SanVoice discloses the following proceedings, each of which may bear on this certification.

- **FCC 26-32** (91 Fed. Reg. 42602, July 9, 2026) proposes to codify the infrastructure-control exemption and to remove and reserve 47 C.F.R. § 64.6304 in its entirety. The Commission stated that it “do[es] not believe the exemption can be repealed because it is a necessary outcome of the fact that STIR/SHAKEN can only be implemented in IP networks.” 91 Fed. Reg. at 42621. The Notice separately proposes to require all voice service providers that serve end users directly, including non-facilities-based providers, to make attestation-level decisions for their end users' SIP calls, and asks whether hosted PBXs and similar platforms should be treated as facilities-based. If adopted, that proposal would impose new duties on SanVoice, and SanVoice will comply with any rules adopted.
- **FCC 26-49** (Improving the Effectiveness of the Robocall Mitigation Database, Further Notice of Proposed Rulemaking, WC Docket Nos. 24-213 and 17-97, CG Docket No. 17-59, rel. July 23, 2026) states that “‘voice service,’ for the purposes of our rules targeting illegal calls, includes PBXs,” and proposes to codify a requirement that a filer claiming an exemption cite the specific rule relied upon. This plan states that rule in Section 3.
- **Bureau findings on deficient exemption claims.** In FCC 26-32, the Commission reported that Bureau staff completed a review identifying 338 filings — 3.2% of filings in the database at the time of review — that assert an exemption without explaining in detail why it applies. Of those, 272 asserted a lack of control over network infrastructure while claiming the separate SPC token exemption. The Commission separately identified reliance on a downstream provider's authentication, and a lack of numbering resources, as invalid bases. FCC 26-49, ¶ 28. SanVoice asserts none of those bases, and states its rule and its explanation in Section 3.

SanVoice will amend this plan and its Robocall Mitigation Database entry within ten business days of any change to the information required by 47 C.F.R. § 64.6305(d)(1) through (4), including any change to SanVoice's network role, interconnection arrangements, or numbering authority.

4. Robocall Mitigation Program

Scope and timing. SanVoice has not yet commenced service to any customer as of the date of this filing. The measures described below are SanVoice's robocall mitigation program, adopted and ready to operate before the first customer goes live. Where a measure operates on a recurring cycle, the first occurrence of that cycle will be dated from SanVoice's actual service-commencement date, once that date is set.

4.1 Know-Your-Customer and Onboarding Verification

SanVoice sells only to identified business end users. SanVoice offers no self-service signup, provisions no accounts through automated or anonymous channels, and does not resell wholesale origination capacity to other carriers, aggregators, or intermediate providers. Before any telephone number, DID, or calling service is provisioned to a new customer, SanVoice completes each of the following:

- **Executed written service agreement.** The customer executes SanVoice's written Service Agreement, identifying the customer's legal business name, physical service address, and a named authorized signer for the account.
- **Independent verification of business existence.** SanVoice checks the applicable state corporate registry — for Florida customers, the Florida Division of Corporations "Sunbiz" database — and confirms that the business name and address given by the customer match the registry record. SanVoice retains a dated copy of the registry record in the customer file.
- **Documentary proof of address.** SanVoice requires the prospective customer to produce a current utility bill or a current telephone bill issued in the business's name at the business's service address, and retains a copy in the customer file.
- **Payment instrument in the business's name.** SanVoice requires a payment method on file in the name of the business, established through SanVoice's Auto-Pay Authorization form.
- **Porting authorization.** Where the customer ports existing telephone numbers to SanVoice, the customer executes a written Letter of Authorization confirming the customer's authority over each number to be ported.

These steps are designed so that each SanVoice account is traceable to a named, state-registered business at a documented physical address, with an authorized signer of record and a payment instrument in the business's name.

No self-service provisioning. SanVoice will give each customer online access to that customer's own account through a customer portal, limited to viewing that customer's own service and call records. SanVoice provisions every telephone number issued on its service, and will do so only after the verification described above is complete.

Rule basis. These measures implement SanVoice's obligation under 47 C.F.R. § 64.1200(n)(4) to "take affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic." This obligation applies to SanVoice regardless of its STIR/SHAKEN implementation status.

4.2 Contractual Prohibitions and Enforcement Rights

- SanVoice's written Service Agreement prohibits use of SanVoice's service to originate illegal robocalls, to transmit unlawfully spoofed caller identification information, or to place calls in violation of the Telephone Consumer Protection Act, the Truth in Caller ID Act, or the Commission's implementing rules.

- SanVoice reserves the right to suspend or terminate service immediately and without advance notice upon a determination that a customer is originating or facilitating illegal robocall traffic.
- Where SanVoice suspends or terminates a customer on these grounds, SanVoice retains the account record and the verification documentation collected at onboarding, and will make them available to the Commission, law enforcement, or the industry traceback consortium upon request. Call detail records for SanVoice customer traffic are generated and retained on the platform of SanVoice's underlying carrier; SanVoice accesses them through that carrier's reseller interface and will obtain and produce them on request.

4.3 Traffic Monitoring and Analysis

- **Scheduled monthly review.** SanVoice will review customer call detail records not less than monthly, using the call records and usage reporting made available through its underlying carrier's reseller interface, beginning within 30 days after SanVoice's first customer is provisioned. As of the date of this filing, SanVoice has not yet commenced service to any customer, so no review cycle has yet run.
- **Indicators reviewed.** The review examines each account for indicators associated with illegal robocall traffic, including sudden or unexplained increases in outbound call volume; a high ratio of failed, unanswered, or very short duration calls; high volumes of outbound calls relative to the number of seats on the account; sequential or patterned dialing; and calling activity inconsistent with the customer's verified line of business.
- **Escalation.** An account exhibiting any such indicator is escalated to SanVoice's robocall mitigation contact for investigation. SanVoice contacts the customer to establish the purpose of the traffic, and suspends the account pending resolution where the indicators are not satisfactorily explained or where the traffic appears unlawful.
- **Out-of-cycle review.** SanVoice reviews an account immediately, without waiting for the monthly cycle, upon receipt of a traceback request, a complaint from any source, a notice from its underlying carrier, or an inquiry from the Commission or law enforcement.

4.4 Call Analytics — 47 C.F.R. § 64.6305(d)(2)(ii)

SanVoice does not subscribe to any call analytics or reputation-scoring service and uses no third-party analytics vendor. SanVoice identifies potentially illegal traffic through the manual review of call detail records and usage reporting described in Section 4.3, which will be applied across SanVoice's full customer base — a manual approach that is feasible because SanVoice expects a small enough customer base that every account can be individually reviewed in each cycle. SanVoice's underlying carrier, VoIP.ms, applies its own analytics and blocking to traffic carried on its network; SanVoice neither controls nor configures those systems. SanVoice will amend this plan within ten business days if it adopts an analytics system or engages an analytics vendor.

4.5 Traceback Cooperation

SanVoice will fully respond to any traceback request received from the Commission, civil law enforcement, criminal law enforcement, or the industry traceback consortium within 24 hours of receipt, as 47 C.F.R. § 64.1200(n)(1) requires, and commits to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls, as 47 C.F.R. §§ 64.6305(a)(2) and (d)(2)(iii) require SanVoice to state. SanVoice's designated point of contact for traceback requests is identified in Section 1. Traceback correspondence sent to that address is routed to a mobile device carried by SanVoice's President.

Because SanVoice will serve only identified, documented business end users and will accept no wholesale or transit traffic, SanVoice expects to be able to identify the originating customer associated with any call on its service, together with that customer's verification documentation, and to provide that information in response to a traceback.

4.6 Response to Commission Notification of Suspected Illegal Traffic

Upon receipt of a Notification of Suspected Illegal Traffic from the Enforcement Bureau under 47 C.F.R. § 64.1200(n)(2), SanVoice will promptly investigate the identified traffic and report the results of that investigation to the Enforcement Bureau within the timeframe specified in the Notification. If SanVoice's investigation determines that it served as the originating provider for the identified traffic, SanVoice will block or cease accepting that traffic and substantially similar traffic on an ongoing basis within the timeframe specified. SanVoice's mechanism for doing so, given that it operates no network of its own, is to suspend or terminate the originating customer's account under Section 4.2 and to instruct VoIP.ms to cease carrying traffic from that customer's provisioned numbers.

If the Enforcement Bureau notifies SanVoice under 47 C.F.R. § 64.1200(n)(3) that a Final Determination Order has issued finding that a provider from which SanVoice directly receives traffic has failed to comply with § 64.1200(n)(2), SanVoice will block and cease accepting all traffic received directly from that provider beginning 30 days after the release date of the Final Determination Order — in SanVoice's case, by instructing VoIP.ms, as SanVoice's sole upstream provider, to cease routing that provider's traffic to SanVoice, since SanVoice has no network element of its own on which to effect the block directly.

4.7 Underlying Provider Diligence

- SanVoice obtains voice origination and termination service from a single underlying carrier, VoIP.ms, which bears its own STIR/SHAKEN authentication and traceback obligations as the facilities-based provider in the call path. Before accepting its first customer, SanVoice will confirm that carrier's current listing in the Robocall Mitigation Database and record the filing entity name and the date checked, and will re-confirm that listing in connection with each annual recertification.
- SanVoice's agreement with its underlying carrier incorporates that carrier's acceptable use policy, which prohibits use of the service for unlawful calling and permits suspension for violation.
- SanVoice will not add any additional upstream carrier, downstream customer-carrier, or intermediate provider without first confirming that provider's current listing in the Robocall Mitigation Database, and will not accept traffic from any provider not so listed. SanVoice will take reasonable and effective steps, consistent with 47 C.F.R. § 64.1200(n)(5), to confirm that any provider from which it directly receives traffic is not using SanVoice's service to carry or process a high volume of illegal traffic.

4.8 Accountability, Training, and Plan Maintenance

- Peterson Pierre, President, is designated as SanVoice's robocall mitigation point of contact and is responsible for onboarding verification, monthly traffic review, traceback response, and maintenance of this plan.
- SanVoice presently has no personnel other than its President. Any personnel SanVoice engages to onboard customers or handle account provisioning will be trained on these verification and monitoring obligations before being given provisioning access, and will be instructed to escalate any suspected illegal traffic to the robocall mitigation contact.
- This plan will be reviewed not less than annually in connection with SanVoice's Robocall Mitigation Database recertification, beginning with the recertification due March 1, 2027, and will be amended within ten business days of any change to the information SanVoice is required to provide under 47 C.F.R. § 64.6305(d)(1) through (4).

5. Compliance History and Ownership

Neither SanVoice, LLC nor any entity with which SanVoice shares common ownership, management, directors, or control has been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to

transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

SanVoice, LLC has no parent company, no subsidiaries, and no affiliates. Its sole member and officer is Peterson Pierre, President, who holds a one hundred percent membership interest.

6. Certifications

SanVoice, LLC certifies as follows:

- SanVoice is an officer-certified filer. The undersigned is an officer of SanVoice, LLC, duly appointed, and has examined this Robocall Mitigation Plan.
- All of the calls that SanVoice originates are subject to the robocall mitigation program described in this plan, consistent with 47 C.F.R. § 64.6305(a).
- No prior SanVoice certification has been removed by Commission action, and SanVoice has not been prohibited from filing in the Robocall Mitigation Database by the Commission.
- This plan accurately describes the reasonable steps SanVoice has implemented, and will continue to implement, to avoid originating illegal robocall traffic.

SanVoice, LLC acknowledges that this submission is subject to 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and that false statements or misrepresentations to the Commission are punishable under Title 18 of the United States Code and may subject the company to enforcement action.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: _____



Name: Peterson Pierre

Title: President, SanVoice, LLC

Date: _____

09/10/2026

