
Robocall Mitigation Program Description

Prepared for submission to the FCC Robocall Mitigation Database (RMD)

LEGAL NAME	Alora Telecom LLC	FRN	0038845277
EIN	61-2380502	STATE OF FORMATION	Florida

Program Description

Alora Telecom LLC ("Alora") has not yet implemented the STIR/SHAKEN caller ID authentication framework on any portion of its network. Alora does not currently operate its own call-signing infrastructure and has not finalized a signed, active arrangement with an upstream voice services platform provider to perform STIR/SHAKEN authentication on its behalf. Accordingly, Alora certifies under Option 3 (No STIR/SHAKEN Implementation) of the Robocall Mitigation Database.

Notwithstanding the absence of STIR/SHAKEN implementation, Alora maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a), including the following measures:

- Alora takes reasonable steps to prevent unlawful robocall traffic from originating on its network, including customer vetting (Know Your Customer practices), monitoring of call patterns for signs of illegal or fraudulent robocalling activity, and contractual prohibitions on customers/resellers originating illegal robocalls.
- Alora commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).
- Alora cooperates with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping illegal robocallers who use its network to originate calls, including suspending or terminating service to customers found to be originating illegal robocall traffic.
- Alora has not had any prior RMD certification removed by Commission action and is not prohibited from filing in the Robocall Mitigation Database.

Alora provides voice services both as a wholesale originating provider to other carriers/resellers and directly to retail end-users, and applies the above mitigation measures across both categories of traffic.

Alora intends to implement STIR/SHAKEN call authentication once it has finalized and activated an arrangement with a voice services platform provider capable of performing call signing on its behalf. This program description will be updated, and Alora's RMD certification revised accordingly, once such implementation is active.