

Robocall Mitigation Plan

Spartan Media LLC d/b/a SpartanComm

Filed with the FCC Robocall Mitigation Database

Company: Spartan Media LLC (d/b/a SpartanComm)

Principal place of business: 9890 Liberia Ave PMB 1147, Manassas, VA 20110

FCC Registration Number (FRN): 0038801635

Contact for traceback and enforcement: sales@espartan.net · +1 (703) 705-4977

1. Company and service description

Spartan Media LLC provides multi-tenant business voice service (interconnected VoIP), SMS, and WhatsApp messaging to small businesses in the United States under the SpartanComm brand. All PSTN traffic — inbound and outbound — originates and terminates exclusively through **Telnyx LLC**, our sole underlying carrier. Spartan Media does not peer with any other carrier, does not accept wholesale traffic from other providers, and does not permit customers to bring their own upstream carriers.

2. Caller ID authentication (STIR/SHAKEN)

All outbound calls are signed under the STIR/SHAKEN framework by our underlying carrier, Telnyx, with **Full Attestation (A)**: all caller IDs used on the platform are numbers assigned to our own Telnyx account and provisioned to the specific customer, so the originating carrier knows the customer, knows the customer's right to use the number, and knows the call originated on its network. Customers cannot originate traffic with numbers not assigned to them (see §6). The single exception — forwarded calls, which carry the original caller's number — is described and quantified below.

Measured result. We audited every outbound call detail record for the 30 days ending August 19, 2026 (sample of 1,358 outbound calls): **1,356 (99.9%) carried Full Attestation (A)**. Two calls returned *unavailable*, and we identified the cause: those are **forwarded calls**, where an inbound caller reaches one of our DID's and the PBX forwards the call onward while preserving the *original* caller's number. Because that number is not assigned to our account, the underlying carrier cannot attest to it. We preserve the original caller ID on forwarded calls deliberately, so the called party sees who is actually calling; we do not substitute or fabricate caller IDs in any case. Apart from forwarded calls, every caller ID presented by the platform is a number assigned to our own Telnyx account and provisioned to the specific customer (enforced server-side, see §6).

Telnyx support confirmed in writing (August 19, 2026) that (a) Telnyx is the originating voice service provider for calls placed with numbers on our account and signs them with Full Attestation (A), applied automatically; (b) **Telnyx's own Robocall Mitigation Database registration covers Telnyx**

as a carrier and does not extend to resellers, and that a reseller meeting the definition of voice service provider in 47 C.F.R. § 64.1600(r)(1) is expected to maintain its own RMD registration and mitigation plan — which is the basis for this filing; and (c) attestation levels are independently verifiable by us per call through the Telnyx Mission Control portal, which reports the attestation value of every call. We retain those exports as evidence supporting this section.

On August 23, 2026, Telnyx further confirmed in writing, citing Sections 11.13, 11.14 and 11.17 of its Terms and Conditions, that in the traceback process Telnyx responds to the traceback administrator identifying whether it acted as the Originating Provider or as a Transit Provider, and that where Telnyx acted as a Transit Provider it identifies Spartan Media as the source — at which point **"Spartan Media LLC is identified as the responsible Originating Provider."** Telnyx further stated that **"under Section 11.17, Spartan Media LLC must be registered in the FCC's Robocall Mitigation Database if it qualifies as a voice service provider under STIR/SHAKEN,"** which is the basis for this filing.

2.1 Scope of the attestation statement

Full Attestation (A) applies to calls placed with telephone numbers purchased or ported into Spartan Media's account with its underlying carrier. As of August 22, 2026, **all 28 telephone numbers routed on the platform are held in that account**, and accordingly all traffic Spartan Media originates receives Full Attestation (A), as measured in §2. Should Spartan Media at any point route a telephone number not held in that account, traffic presenting that number would receive Partial Attestation (B). Spartan Media monitors this condition through the per-call attestation values available to it and will update this filing within ten (10) business days should it change.

2.2 Basis for filing as a voice service provider without a STIR/SHAKEN obligation

Spartan Media LLC files as a **voice service provider without a STIR/SHAKEN obligation** under 47 C.F.R. § 64.6301. Spartan Media does not have access to the infrastructure necessary to implement STIR/SHAKEN authentication in the IP portion of a network it controls, for the following reasons, each independently verifiable:

1. **No numbering resources of its own.** Spartan Media holds no direct access to North American Numbering Plan resources. Every telephone number used on the platform is assigned to Spartan Media's account by Telnyx LLC, the underlying carrier, which retains the numbering authority.
2. **No Operating Company Number (OCN).** Spartan Media is not required to have, and does not have, an OCN.
3. **Does not meet the STI-PA's eligibility criteria for an SPC token.** Under STI-GA Policy Decision 001 (*SPC Token Access Policy*, v1.2, in effect), an entity must (i) have a current FCC Form 499-A on file, (ii) **have been assigned an Operating Company Number (OCN) or a Resp Org ID**, and (iii) be listed in the FCC's Robocall Mitigation Database. Spartan Media has

not been assigned an OCN or a Resp Org ID and therefore does not qualify for SPC token access, and consequently cannot obtain the digital certificate required to sign calls under 47 C.F.R. § 64.6301(a). The STI-GA expressly contemplates this category of provider, directing entities that "do not qualify for SPC token access" to "reach out to your underlying carrier."

4. **Authentication occurs upstream.** All calls originated by Spartan Media's customers are authenticated and signed by Telnyx, which does hold the necessary certificates and does implement STIR/SHAKEN across its network (Telnyx LLC, FRN 0018998724, *Complete STIR/SHAKEN Implementation*), and which applies Full Attestation (A) to that traffic as documented and measured in §2.

Consistent with this limitation, **47 C.F.R. § 64.6304(b)** exempts a voice service provider from the § 64.6301 authentication obligation for so long as the provider remains unable to obtain an SPC token as a direct result of STI Governance Authority policy — precisely the circumstance described in items 1 through 3 above. The Commission's Robocall Mitigation Database certification rule, **47 C.F.R. § 64.6305**, directs a provider relying on this exemption to select *No STIR/SHAKEN Implementation* in its registration and to state the rule that exempts it from compliance, together with a detailed explanation of why that exemption applies — which is what this section does.

Because Spartan Media originates traffic that reaches end users and holds a direct business relationship with the calling parties, it meets the definition of voice service provider in 47 C.F.R. § 64.1600(r)(1) and therefore maintains this robocall mitigation program and RMD registration, consistent with the *Call Authentication Trust Anchor* Sixth Report and Order, 38 FCC Rcd. 2573 (2023), which requires resellers to file robocall mitigation plans.

3. Know your upstream provider

Spartan Media LLC receives voice service from a **single** upstream provider and accepts no traffic from any other source:

Telnyx LLC

311 W 3rd Street, Austin, TX 78701

FRN: 0018998724 · RMD filing: RMD0001645

RMD status: *Complete STIR/SHAKEN Implementation* · Voice Service Provider: Yes

Regulatory/traceback contact: legal@telnyx.com · Support: support@telnyx.com

Spartan Media operates under a master service agreement with Telnyx and has received written confirmation (August 19, 2026) that Telnyx signs the calls transmitted on Spartan Media's account with Full Attestation (A) and abides by the Commission's STIR/SHAKEN and robocall mitigation rules with respect to that traffic. Spartan Media does not act as a gateway provider or as a non-gateway intermediate provider: it does not accept, transit, or terminate traffic originated by any other voice service provider, and it does not permit customers to bring their own upstream carriers.

4. Ownership, principals, affiliates, and enforcement history

- **Legal entity:** Spartan Media LLC, a Virginia limited liability company, d/b/a SpartanComm (Fictitious Name Certificate, Virginia State Corporation Commission, August 21, 2026, filing 26082110382102).
- **Corporate structure:** Spartan Media LLC is a single legal entity. The brands under which it operates are trade names of that entity, not separate legal persons. Spartan Media LLC has **no parent company, no subsidiaries, and no affiliates**, and there is no other entity with which it shares common ownership, management, directors, or control.
- **Principals and management:** Jose Daniel Leon, Managing Member. Spartan Media LLC is a **single-member limited liability company**: Mr. Leon is its sole member, and there are no other members, partners, officers, or directors.
- **Previous business names:** None.
- **Other DBA names:** SpartanComm.
- **Operating Company Number (OCN):** Spartan Media LLC is not required to have, and does not have, an operating company number.

Enforcement history. Neither Spartan Media LLC, nor any of its executives or principals, has at any time in the prior two years been 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 of a deficient Robocall Mitigation Database certification or mitigation program description. Spartan Media LLC has not been prohibited from filing a certification in the Robocall Mitigation Database by the Commission, and no prior certification of Spartan Media LLC has been removed by Commission action.

5. Know-your-customer (KYC) controls at onboarding

- **Clickwrap agreement:** every customer must affirmatively accept our Terms of Service — which prohibit robocalling, spoofing, and telemarketing without consent (Acceptable Use, ToS §7) — before service is activated. Each acceptance is recorded with user identity, document version, timestamp, IP address, and source in an immutable acceptance record.
- **Business identity:** self-service signup requires the legal business name, physical business address, and contact identity; EIN is collected where provided. Sales-assisted onboarding records the operator, the offer, and the full provisioning trail in an audit log.
- **Payment identity:** a payment method is captured through Stripe at onboarding, providing a verified billing identity for every tenant.

6. Technical controls that prevent abusive origination

- **Caller ID enforcement at the PBX:** the outbound caller ID of every extension is enforced server-side in the Asterisk dialplan from platform-managed variables. A customer device cannot present a caller ID that the platform did not assign to it.
- **Registration security:** SIP credentials are 32-character random secrets; intrusion attempts are automatically blocked (fail2ban) with all attempts logged; compromised-credential incidents are remediated by immediate credential rotation and endpoint deactivation.
- **Automated auto-dialer detection, with two tiers:** an **hourly** monitor analyzes outbound traffic per extension for the signature of automated dialing (call volume, destination uniqueness, and call duration, calibrated against a real incident described in §6.1). Below the automated-action threshold, a detection generates an immutable alert record and same-hour notification to management for human review and action (credential rotation, extension suspension, or tenant suspension). At or above the automated-action threshold, the platform acts without waiting for human review: the implicated extension is disabled, the tenant account is suspended, and the incident is reported to the upstream carrier's abuse desk the same day, in addition to notifying management.
- **International restriction:** outbound international dialing is disabled by default. Mexico is the only international destination the dialplan recognizes; it is enabled per extension (or, where operationally justified, per calling queue) only on request, and the platform additionally normalizes the outbound caller ID on that traffic to the identity required by the upstream carrier's outbound voice profile for that destination. No other international destination is dialable.

6.1 Call analytics and third-party vendors

The analytics described above are **operated by Spartan Media on its own platform**, against its own call detail records. Detection thresholds were calibrated against a real toll-fraud incident on the platform (July 8, 2026), in which compromised SIP credentials on a single extension were used to originate fraudulent traffic; that incident was contained by credential rotation and endpoint deactivation, and drove both the 32-character credential standard and the automated detection and response tiers described in §6.

Third-party vendors: Spartan Media does not use any third-party vendor to perform robocall mitigation, call analytics, or traffic blocking on its behalf. Spartan Media additionally benefits from the network-level analytics and blocking operated by its upstream provider, Telnix, on the traffic it carries.

7. Commitment to traceback cooperation

Spartan Media LLC commits to fully and promptly cooperate with the Industry Traceback Group (ITG), the FCC, and law enforcement. Traceback requests received at sales@espartan.net will be answered within **24 hours** with the customer identity, onboarding records, and call detail associated with the traffic in question. Records retained: call detail records, ToS acceptances, abuse alerts, and onboarding audit logs.

The contact point published in this filing and in the Robocall Mitigation Database is the channel through which the ITG reaches us, consistent with the ITG's stated practice of sourcing provider contacts from the RMD. Our underlying carrier, Telnyx, coordinates directly with the ITG on tracebacks involving traffic on our account and we cooperate with that channel as well.

8. Response to identified abusive traffic

Upon detection or notification of illegal robocall traffic:

1. The offending extension or tenant is suspended immediately;
2. Credentials are rotated and the incident is documented;
3. The customer relationship is terminated where the traffic was knowing or repeated;
4. Relevant records are preserved and provided to the ITG/FCC upon request.

9. Blocking, Do Not Originate, and Do Not Call

- **Do Not Originate (DNO):** Spartan Media will implement any Do Not Originate request it receives from the ITG or the Commission. Because all caller IDs are platform-assigned and enforced server-side (§6), a number subject to a DNO request can be removed from origination immediately and cannot be re-presented by a customer device.
- **Do Not Call (DNC):** Spartan Media's Terms of Service require customers to comply with the FTC's Do Not Call Registry rules and the TCPA, and prohibit telemarketing without prior express consent (Acceptable Use, ToS §7).
- **Blocking:** where Spartan Media or its upstream provider identifies suspected illegal robocall traffic that is confirmed on investigation, Spartan Media suspends or terminates the offending extension or tenant (§8), and notifies its upstream provider so that blocking can be applied at the network level.

10. Plan updates and recertification

Spartan Media LLC will review and update this plan as its platform, controls, and upstream arrangements change. In the event of any material change to this plan, or to any information

contained in this filing or in Spartan Media's CORES registration, Spartan Media will file the update to the FCC Robocall Mitigation Database **within ten (10) business days** of the change, as required. Spartan Media will recertify its RMD filing annually **by March 1**, reviewing the accuracy of every field and of this mitigation program description before certifying.

11. Certification

An officer of Spartan Media LLC certifies that the company has implemented the robocall mitigation program described above, that all traffic it originates is subject to that program, and that it will cooperate with traceback requests. The officer certification required at filing is executed separately and under penalty of perjury, and is submitted together with this plan.

Signature:

A handwritten signature in black ink, appearing to be 'Jose Daniel Leon', written in a cursive style.

Name: Jose Daniel Leon

Title: Managing Member

Date: September 25, 2026