

Zero Calling LLC

Robocall Mitigation Program Description

Zero Calling LLC is an originating voice service provider that utilizes registered upstream carriers for PSTN connectivity and call authentication. Zero Calling LLC does not directly implement the STIR/SHAKEN authentication framework and relies on its upstream providers for authentication compliance pursuant to 47 CFR § 64.6301 and § 64.6305.

Robocall Mitigation Measures Implemented by Zero Calling LLC:

1. Customer Verification (KYC):

Zero Calling LLC verifies the identity of all customers prior to enabling outbound calling services. This includes business verification, identity confirmation, and review of intended traffic use cases.

2. Traffic Monitoring:

Zero Calling LLC actively monitors call traffic patterns for unusual volumes, short duration calls, high answer-seizure ratios, and other indicators of potentially illegal robocall activity.

3. Prohibited Use Enforcement:

Customers are contractually prohibited from transmitting unlawful robocalls, spoofed caller ID, or fraudulent traffic. Violations result in immediate suspension or termination.

4. Traceback Cooperation:

Zero Calling LLC commits to responding fully and within 24 hours to traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Group.

5. Upstream Carrier Coordination:

Zero Calling LLC cooperates with upstream voice service providers to ensure compliance with STIR/SHAKEN and to prevent origination of illegal robocall traffic.

Zero Calling LLC maintains internal procedures designed to prevent the origination and transmission of illegal robocalls and complies with 47 CFR § 64.6305(a).