

# Global Voice tech LLC – Robocall Mitigation Plan

Date: Oct 08, 2026

## 1. Company Information

Legal Name: Global Voice Tech LLC

FCC Registration Number (FRN): 0038896866 Compliance

Contact: Nasir Ilyas

Email: [contact@globalvoicetech.com](mailto:contact@globalvoicetech.com)

Phone: 786 939 2773

Business Address: 1500 N GRANT ST STE 5476, DENVER, COLORADO, 80203

## 2. Service Description

Global Voice Tech LLC is a registered VoIP service provider offering both inbound and outbound voice services to commercial clients.

Call origination does not occur over SIP-based IP interconnection. Instead, our network relies on upstream carriers for SIP signaling and routing.

Therefore, Heembay LLC does not have the technical capability to implement STIR/SHAKEN directly. However, the company maintains a strict robocall mitigation program in full compliance with FCC regulations.

## 3. Robocall Mitigation Practices

### A. Know Your Customer (KYC)

- All clients undergo due diligence prior to onboarding.
- We verify client identity, collect valid business documentation, and evaluate intended use cases.
- Clients must sign a formal service agreement before services are activated.

### B. Call Traffic Monitoring

- Outbound traffic is continuously monitored for anomalies using automated and manual tools.
- Unusual patterns such as high call volumes, short-duration calls, or invalid number formats are flagged and investigated.

### C. Call Blocking and Blacklisting

- We block known spam numbers, invalid CLI patterns, and Do-Not-Originate (DNO) numbers.
- Our blocklists are updated regularly based on industry intelligence and government sources.

### D. Complaint Handling

- End-users and carriers can submit complaints through email or phone.
- Complaints are reviewed within 24 hours.
- If misuse is identified, we suspend or terminate services immediately.

### E. STIR/SHAKEN Participation

- Heembay LLC has not implemented STIR/SHAKEN due to technical limitations in our infrastructure.
- SIP signaling is fully managed externally by upstream providers.

## 4. Compliance Contact

Name: Nasir Ilyas (Principal / Compliance Officer) Email:

[nilyas@globalvoicetech.com](mailto:nilyas@globalvoicetech.com)

Phone: 786-939-2773

## 5. Principals, Affiliates, Subsidiaries, and Parent Companies

Global Voice Tech LLC is a privately-owned company.

- Principal: Nasir Ilyas
- Ownership: 100%

- Parent / Subsidiaries / Affiliates: None

#### **6. STIR/SHAKEN Exemption Justification**

Heembay LLC has not implemented the STIR/SHAKEN authentication framework on any portion of its network. Our current voice infrastructure does not support SIP-based interconnection, which is required for STIR/SHAKEN. All SIP functionality is managed externally by upstream carriers.

In accordance with 47 CFR § 64.6304(d), Heembay LLC qualifies for a STIR/SHAKEN exemption because:

- It lacks the technical capability to implement STIR/SHAKEN;
- All SIP functionality is managed externally.

Heembay LLC complies with 47 CFR § 64.6305(a) by:

- Implementing robust robocall mitigation practices;
- Responding to traceback requests within 24 hours;
- Cooperating with FCC, law enforcement, and traceback partners to combat illegal robocalls.

Signed, Nasir

Ilyas

Principal & Compliance Officer Global

Voice Tech LLC

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