

Robocall Mitigation Plan

LevelUP Solutions Pty Ltd | Version 1.0 | Effective October 2026

Legal name	LevelUP Solutions Pty Ltd
Country of organisation	Australia (Queensland)
Australian Business Number	28 610 244 981
FCC Registration Number (FRN)	0038988192
Principal address	30 Needlewood Road, Caboolture QLD 4510, Australia
Provider role(s)	Foreign voice service provider; foreign intermediate provider (for traffic transiting its network)
STIR/SHAKEN status	No STIR/SHAKEN implementation; relies on this Robocall Mitigation Program

1. Purpose and commitment

LevelUP Solutions Pty Ltd ("LevelUP") is an Australian managed IT and telecommunications provider. This plan describes the reasonable steps LevelUP takes to avoid originating, carrying or processing illegal robocall traffic, as required by 47 CFR § 64.6305. LevelUP commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperate with them in investigating and stopping illegal robocallers that use its service.

2. Services and customer base

LevelUP provides hosted PBX, SIP trunking and business voice services, primarily to small and medium businesses located in Australia. LevelUP obtains U.S. NANP numbers and U.S. call termination from U.S.-based upstream providers in order to give its business customers a U.S. presence and to complete their calls to U.S. destinations.

- LevelUP does not offer, permit or support autodialer, predictive dialler, voice broadcasting, telemarketing, lead-generation or other high-volume outbound calling services.
- LevelUP does not sell call termination to other carriers or wholesale customers for U.S.-bound traffic. U.S.-bound traffic on LevelUP's network originates only from LevelUP's own verified business customers.
- U.S. calling is not enabled by default. It is enabled on a per-account basis only after the customer has completed the verification steps in Section 3.

3. Know Your Customer

Before a customer can originate calls to the United States or use a U.S. number, LevelUP:

- Verifies the customer's legal identity and business registration against the Australian Business Register and ASIC (or equivalent official registry), and confirms the business is active.
- Verifies the identity of an authorised representative and keeps contact details for that representative.

- Records the customer's business purpose and expected calling pattern, including expected U.S. call volumes.
- Requires acceptance of LevelUP's terms of service, which prohibit illegal robocalls, caller ID spoofing, and unlawful telemarketing, and which require compliance with the TCPA, the Telemarketing Sales Rule and the Australian Spam and Do Not Call Register frameworks.
- Declines or terminates service to any customer that has been identified in a traceback, is listed on enforcement or industry block lists, or cannot be verified.

4. Caller ID controls

- LevelUP's session border controller only allows outbound calls to present a caller ID that is either (a) a number assigned to that customer by LevelUP, or (b) a number the customer has proven it holds the right to use through documentary evidence such as a carrier invoice or letter of authorisation.
- Calls that present an unassigned, invalid, unallocated or unverified caller ID are rejected and are not passed to U.S. upstream providers.
- LevelUP blocks calls that present numbers on the industry Do-Not-Originate (DNO) list and complies with all blocking requirements in FCC orders.
- Customers cannot alter caller ID on calls to the United States through self-service tools.

5. Traffic monitoring and analytics

- Each customer account has call-per-second and concurrent-call limits sized to its verified business profile. Default U.S. limits are 2 calls per second and 10 concurrent calls per account, and are raised only after review.
- LevelUP monitors call detail records for indicators of robocall activity, including sudden volume spikes, high proportions of very short calls, low answer-seizure ratio, sequential or random dialling patterns, and unusual destination spread.
- Automated alerts are reviewed by LevelUP's network operations staff on business days. Suspicious traffic is suspended pending investigation.

6. Upstream and downstream providers

- LevelUP exchanges U.S. traffic only with U.S. providers that have current filings in the Robocall Mitigation Database.
- LevelUP does not accept traffic from providers that have been removed from the Robocall Mitigation Database or that are subject to an FCC blocking order.
- If LevelUP later accepts U.S.-bound traffic from another provider, it will first confirm that provider's Robocall Mitigation Database filing and apply the controls in this plan to that traffic.

7. Traceback and enforcement

- LevelUP responds to every traceback request within 24 hours, identifying the upstream source of the call.
- On credible evidence of illegal robocalls, LevelUP suspends the customer's U.S. calling within 24 hours, investigates, and terminates the service where a violation is confirmed.
- LevelUP keeps call detail records for at least 24 months (2 years) to support tracebacks and investigations.

- LevelUP will notify the FCC and cooperate with law enforcement where it identifies illegal robocall activity.

8. Review and recertification

LevelUP reviews this plan at least once a year, and whenever its services or network change in a way that affects robocall risk. LevelUP will recertify its Robocall Mitigation Database filing by March 1 each year and will update its filing and CORES information within ten business days of any change.

9. Robocall mitigation contact

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Certified on behalf of LevelUP Solutions Pty Ltd:



Brendon Allen, Director

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