

Robocall Mitigation Plan

New York Mobile, LLC

Underlying Carrier: T-Mobile USA, Inc.

Date: 10/15/2026

Filed Pursuant to 47 CFR § 64.6305

1. Provider Overview

New York Mobile, LLC is a Mobile Virtual Network Operator providing retail wireless voice services within the United States. The company does not operate its own radio access network and relies entirely on T-Mobile USA, Inc. for radio access, switching, and STIR/SHAKEN call authentication functions.

New York Mobile, LLC originates voice traffic through T-Mobile's network interfaces and does not maintain independent SS7, IMS, or IP-based call-signing infrastructure.

2. STIR/SHAKEN Implementation Status

Under 47 CFR § 64.6305(d)(1), New York Mobile, LLC certifies the following:

- STIR/SHAKEN Implementation Type: Hosted / Partial Implementation T-Mobile performs STIR/SHAKEN call authentication on behalf of New York Mobile, LLC for all IP-originated calls.
- New York Mobile, LLC does not operate its own STIR/SHAKEN signing infrastructure due to lack of control over the underlying network, consistent with FCC rules permitting hosted or partial implementations.

Because New York Mobile, LLC does not fully implement STIR/SHAKEN independently, it must maintain a Robocall Mitigation Plan describing reasonable steps to prevent illegal robocalls.

3. Commitment to FCC Traceback Requirements

Consistent with 47 CFR § 64.6305(a)(2), New York Mobile, LLC commits to:

- Responding to all traceback requests within 24 hours from:
 - FCC Enforcement Bureau
 - Law enforcement
 - The Industry Traceback Group (ITG)
- Cooperating fully with investigations into suspected illegal robocall activity.

New York Mobile, LLC maintains a dedicated compliance email monitored daily:

Compliance Contact:

- Giovanni Perone
- Principal
- gio@nymobile.com
- (212) 212-6969

4. Customer Vetting (“Know Your Customer”) Procedures

Under 47 CFR § 64.6305(d)(2)(ii), New York Mobile, LLC implements the following onboarding controls:

4.1 Identity Verification

- Government-issued ID validation for all activations
- Address verification using USPS or commercial databases
- Payment method verification (credit card, ACH, or validated prepaid instruments)

4.2 Business Customer Screening

For business accounts, New York Mobile, LLC requires:

- EIN verification
- Corporate registration checks
- Validation of authorized signers
- Review of business purpose for high-volume calling

4.3 Prohibited Use Policies

Customers are prohibited from:

- Using autodialers without consent
- Generating mass unsolicited calls
- Spoofing caller ID
- Using SIMs for bulk-calling operations

Violations result in immediate suspension or termination.

5. Upstream Provider Controls

New York Mobile, LLC maintains a direct wholesale relationship with T-Mobile, which:

- Performs STIR/SHAKEN signing for originated calls
- Provides analytics and fraud-detection capabilities
- Enforces network-level blocking of known illegal robocall sources

New York Mobile, LLC reviews T-Mobile's public compliance documentation annually and maintains updated contact channels for fraud and abuse escalation.

6. Traffic Monitoring & Analytics

Under 47 CFR § 64.6305(d)(2)(ii), New York Mobile, LLC uses a combination of internal and upstream analytics:

6.1 Internal Monitoring

- Daily review of call-volume anomalies
- Alerts for:
 - Short-duration, high-volume patterns
 - Repetitive sequential dialing
 - High-risk destinations
- Automated flagging of SIMs exceeding normal usage profiles

6.2 Upstream Analytics (T-Mobile)

T-Mobile provides:

- STIR/SHAKEN verification
- Network-level fraud analytics
- Blocking of known illegal robocall sources
- Real-time signaling-level anomaly detection

6.3 Third-Party Tools

New York Mobile, LLC does not currently use third-party analytics vendors.

7. Illegal Traffic Response Procedures

When illegal or suspicious traffic is detected:

1. Immediate investigation of call records and customer identity
2. 24-hour response to traceback requests
3. Temporary suspension of affected SIMs or accounts
4. Permanent termination for confirmed violations
5. Notification to T-Mobile for upstream blocking
6. Reporting to FCC Enforcement Bureau when required

8. Recordkeeping

New York Mobile, LLC maintains:

- Customer onboarding records (minimum 2 years)
- Call-detail records (minimum 18 months)
- Traceback correspondence
- Internal investigation logs
- Annual RMD recertification documentation

Records are stored securely and accessible to FCC upon request.

9. Annual Recertification Commitment

New York Mobile, LLC will recertify its Robocall Mitigation Database filing annually by March 1, as required by the FCC's 2026 Enforcement Advisory.

10. Certification Statement

New York Mobile, LLC certifies that:

- All originated calls are subject to this robocall mitigation program
- New York Mobile, LLC has not been prohibited from filing in the RMD
- New York Mobile, LLC will maintain compliance with 47 CFR § 64.6305
- New York Mobile, LLC will update this plan as required by FCC rule changes