Robocall Mitigation Program Description

Filing Entity: Plazmatel LLC
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1. Executive Summary & Regulatory Compliance

Plazmatel LLC is committed to maintaining the integrity of the voice communications network. This document outlines the systematic steps, internal guidelines, and technological protocols enforced by Plazmatel LLC to comply with FCC anti-robocalling regulations under 47 CFR § 64.6305. As a conscientious service provider, Plazmatel LLC actively mitigates, detects, and prevents the origination, transit, or facilitation of illegal robocalls and fraudulent caller ID spoofing.

2. STIR/SHAKEN Exemption Justification (47 CFR § 64.6305(a)(1))

Plazmatel LLC has certified under Option 3 (No STIR/SHAKEN Implementation) due to specific operational infrastructure. **Legal Rule:** 47 CFR § 64.6305(a)(1)
Factual Justification: Plazmatel LLC operates strictly as a non-facilities-based voice service provider.
The company does not own, lease, or manage local network transmission hardware, softswitches, or session border controllers (SBCs) capable of natively embedding, generating, or verifying STIR/SHAKEN digital cryptographic certificates. Instead, Plazmatel LLC relies entirely on its upstream wholesale infrastructure carriers to authenticate, token-sign, and securely route caller ID data downstream for all outbound traffic. Because cryptographic authentication takes place at the wholesale carrier gateway level, native implementation within Plazmatel LLC's internal administrative software is technically infeasible.

3. Specific Robocall Mitigation Practices

To prevent the transmission of illegal call traffic before it ever reaches upstream carriers, Plazmatel LLC executes a multi-layered compliance program:

- **Know Your Customer (KYC):** Plazmatel LLC verifies the physical legal entity, business registration, tax identifiers, and operational legitimacy of all commercial clients prior to provisioning voice services.
- **Traffic Analytics & Monitoring:** Automated scripts flag suspicious calling patterns, such as an unusually high volume of short-duration calls, spikes in call volume, or high call-failure rates that mimic automated robocalling behavior.
- **Immediate Enforcement Actions:** If anomalous or suspicious traffic patterns are identified, or if an account is flagged for potential abuse, Plazmatel LLC reserves the right to immediately suspend outbound routing pending a full audit.

4. Industry Traceback Mandate & Cooperation

Plazmatel LLC pledges full cooperation with the Federal Communications Commission (FCC), domestic

law enforcement agencies, and the official Industry Traceback Group (ITG). In accordance with FCC
mandates, Plazmatel LLC maintains a designated regulatory response framework committed to fully
responding to all official traceback inquiries **within 24 hours** of receipt. If an inquiry traces illegal or
fraudulent robocall traffic back to an end-user on our platform, Plazmatel LLC will immediately cooperate
to identify and stop the threat, up to and including permanent termination of the customer's
telecommunications account.