ROBOCALL MITIGATION PLAN

Moitele LLC

Company Information

Item	Details
Company Name	Moitele LLC
FRN	0038923587
Principal Operating Address	7901 4th St N ste 300, St. Petersburg, Fl 33702
Website	https://moitele.com
Owner / Compliance Contact	Kalyan Pasumarthy
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1. STIR/SHAKEN Implementation Status

Moitele LLC is currently in the process of implementing STIR/SHAKEN and is actively working with industry partners and service providers to complete deployment in accordance with applicable FCC requirements.

The company expects STIR/SHAKEN implementation to be completed as part of its ongoing network compliance and authentication framework. Until implementation is fully completed, Moitele LLC relies on robust robocall mitigation procedures, customerverification processes, traffic monitoring, traceback cooperation, and other compliance measures described in this plan to prevent the origination and transmission of illegal robocalls.

Moitele LLC will maintain compliance with all applicable FCC robocall mitigation obligations and will update its policies and procedures as STIR/SHAKEN deployment progresses.

2. Business Model & Network Role

Moitele LLC participates in the telecommunications ecosystem in two primary capacities:

- Wholesale Services: Providing voice termination and interconnection services to carrier partners, resellers, and telecommunications providers.
- Direct Customer Services: Providing telecommunications services directly to retail and business customers originating traffic through the company's network and platform.

Estimated Traffic Distribution

- Direct End-User Traffic: 0%
- Wholesale & Reseller Traffic: 100%

3. Robocall Mitigation Program

Moitele LLC takes affirmative and effective measures to prevent its network from being used to originate illegal robocalls.

3.1 Know Your Customer (KYC) Procedures

- Identity verification of all customers prior to service activation.
- Collection of valid government identification and business registration records.
- Collection of tax identification documentation.
- Verification of authorized representatives and risk-based customer onboarding/screening.
- Enhanced due diligence for high-risk industries, including:
- Debt recovery
- Lead generation
- Healthcare communications
- Political outreach

3.2 Traffic Monitoring & Analytics

Moitele LLC continuously monitors inbound and outbound traffic using automated and manual review processes, tracking:

- High-volume traffic spikes
- Short-duration call activity and sequential dialing patterns? Auto-dialing behavior and completion-rate anomalies
- Other suspicious traffic indicators, backed by automated alerts for unusual activity.

3.3 Call Blocking & Filtering

The company utilizes automated fraud detection and filtering systems to:

- Block suspicious traffic and prevent spoofed calling activity.
- Restrict calls with suspicious caller ID information.
- Act upon STIR/SHAKEN verification warnings by blocking, rejecting, isolating, or investigating compromised traffic.

3.4 Do-Not-Originate (DNO) Protection

Moitele LLC maintains protections against caller ID spoofing and invalid number usage through:

- Industry-standard Do-Not-Originate (DNO) lists.
- Internal risk databases.
- Proactive blocking of invalid, unallocated, or spoofed telephone numbers.

3.5 Traceback Cooperation

Moitele LLC fully cooperates with traceback efforts and industry partners, including the U.S. Telecom Industry Traceback Group.

- Response Time: Responding to traceback requests within 24 hours or within the applicable regulatory timeframe.
- Investigation: Immediate investigation of the traffic source and associated customer account.
- Retention: Retention of traceback records for a minimum of two (2) years.

3.6 Upstream Provider Compliance

Moitele LLC works exclusively with reputable and compliant upstream providers, giving preference to carriers that have implemented STIR/SHAKEN and maintain strong robocall mitigation programs.

3.7 Downstream Customer Enforcement & TCPA Controls

All customers must comply with the Telephone Consumer Protection Act (TCPA), Telemarketing Sales Rule (TSR), Do-Not-Call requirements, and Company Policies. Additional controls include:

- Consent documentation requirements for outbound campaigns.
- Continuous monitoring of customer traffic and immediate investigation of anomalies.
- Immediate suspension or permanent termination of accounts for policy violations.3.8 Record Retention

Moitele LLC maintains Call Detail Records (CDRs), traffic monitoring logs, and customer compliance records for a minimum of two (2) years, keeping them readily available for regulatory or traceback purposes.

3.9 Regulatory Compliance

Moitele LLC complies with all applicable regulations, including FCC Robocall Mitigation Requirements, TCPA, TSR, Federal/State Do-Not-Call laws, and STIR/SHAKEN obligations.

4. Network Security & Traffic Controls

To maintain network integrity and minimize abuse, Moitele LLC employs multiple monitoring, fraud detection, and enforcement mechanisms. Where policy violations are identified:

- Services may be suspended immediately.
- Traffic may be blocked or restricted.
- Accounts may be permanently terminated depending on the severity of the violation.

5. Management & Public Presence

Moitele LLC is a privately owned telecommunications company. Kalyan Pasumarthy serves as the Owner and primary point of contact for compliance, operations, carrier relations, and regulatory matters.

Management remains directly accessible and actively involved in day-to-day operations and compliance oversight. Government-issued identification of the owner has been provided where required to support carrier due diligence and compliance reviews.

Submitted By:

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