ROBOCALL MITIGATION PROGRAM DESCRIPTION

789 NETWORK SOLUTIONS LLC | FCC FRN 0039087747

WORKING DRAFT - INTERNAL OFFICER AND LEGAL REVIEW ONLY. NOT READY FOR FCC UPLOAD OR CERTIFICATION.

1. Entity, business stage, and testing

789 NETWORK SOLUTIONS LLC is a California limited liability company with a reported business address at 18726 Austin Way, Monte Sereno, CA 95030, United States. Wayne Salvatore is its Managing Member and designated regulatory compliance and traceback coordinator.

The company proposes to offer wholesale outbound voice services through SIP trunks and Voice APIs. As of this draft, the company reports no commercial customers and no launched commercial reseller service. It has conducted internal tests that successfully connected calls to U.S. public telephone numbers. These were real PSTN-connected tests, not merely simulated server calls.

The reported test path used Infobip SIP Trunking under a personal account, not an upstream account or contract confirmed to be held by 789 NETWORK SOLUTIONS LLC. The company has not confirmed an upstream agreement in its own legal name. The testing arrangement must not be represented as a company-owned carrier interconnection, commercial service authorization, or proof of compliance.

2. Scope and responsibility

The company is evaluating its classification as a voice service provider based on the planned ability of its customers to originate calls. Final classification must be checked against actual routing, contractual roles, and applicable FCC definitions. Use of an upstream SIP carrier does not, by itself, eliminate any independent obligations applicable to the company.

3. Caller ID and number authorization

The company reports administrator-controlled assignment of private direct inward dialing (DID) numbers to user accounts and an administrator-managed shared number pool. The company states that pool numbers are legally acquired and that calls attempting to use unauthorized numbers are rejected. The company should document number rights, customer authorization, enforcement tests, and account-to-number mappings before production use. Caller ID authorization does not automatically justify a particular STIR/SHAKEN attestation level.

4. Blocking and account enforcement

The company reports that a destination blocklist is evaluated before forwarding outbound requests upstream and that matched requests are rejected locally. It reports violation alerts and automatic account banning after three qualifying violations. Before launch and certification, it must verify enforcement using representative SIP/API tests and document thresholds, exceptions, review and reinstatement procedures.

5. CDRs, monitoring, and incident investigation

The company reports collecting call detail records for its SIP/Voice API application, including caller ID, destination, customer account, timestamp, and disposition. The company should verify record completeness for PSTN-connected tests, any upstream correlation identifiers, retention periods, time synchronization, access permissions, and export procedures. It must not assert possession of records held only by a personal Infobip account.

6. Traceback cooperation

Wayne Salvatore is designated to coordinate traceback and compliance matters. The company reports that WhatsApp/email notifications for official traceback messages are operational and were successfully delivered to Wayne in a test; independent evidence has not been reviewed for this draft. The company intends to cooperate fully with authorized FCC, law-enforcement, and industry traceback requests and meet applicable 24-hour response requirements. It should retain intake and delivery logs, acknowledgment timestamps, investigation notes, and responsive call records.

7. STIR/SHAKEN: unresolved compliance assessment

The company reports that it does not have an OCN, SPC Token, or its own STIR/SHAKEN certificate and has not implemented its own STIR/SHAKEN authentication. Whether Infobip authenticated any test calls, and under what contractual or technical arrangement, is unverified. A personally held Infobip SIP account cannot be assumed to discharge the company's own obligations.

Before selecting any RMD certification option, the company must establish its actual legal obligations, implementation status, and any applicable exception or extension. Selecting a no-implementation certification is not, by itself, a waiver or proof of eligibility. No full, partial, or no-implementation certification is made by this working draft.

8. Remediation and maintenance

The company plans to block suspicious or prohibited traffic, investigate credible complaints, preserve relevant records, suspend abusive accounts, and cooperate with traceback. Operational processes and any changes in contact information, ownership, provider classification, upstream arrangements, and STIR/SHAKEN status should be documented and reflected in required filings.

9. Items to resolve before FCC filing

• Validate voice-provider filing classification and the actual originator/upstream relationship.

• Determine lawful STIR/SHAKEN certification selection and document any applicable exception.

• Verify control operation with call-path logs, CDR exports, DID-rights evidence, and notification test records.

• Confirm official monitored contact channels, 24-hour traceback response capability, and Wayne Salvatore's approval.

• Review affiliate/principal disclosures, regulatory-action history, and all FCC form entries.

• Ensure any production upstream contract and traffic policies accurately identify the responsible legal entity.

Prepared for internal review. No officer signature or FCC certification is included in this document.