Robocall Mitigation Program

Abhishek Kumar dba Trustane · FRN 0039115183 · Version 1.0, November 2026

1. Who we are

Legal name	Abhishek Kumar, doing business as Trustane (sole proprietorship)
Registered in	India (GSTIN 29JOHPK0229D1ZZ)
Address	No 33, 1st Floor, 1st Main, Ganganagar Gramatana, HMT Layout, CBI Main Road, RT Nagar, Bengaluru 560032, Karnataka, India
Principal	Abhishek Kumar, Proprietor
Robocall mitigation contact	Abhishek Kumar, info@trustane.com, +1 561 960 0930
Website	https://trustane.com

Trustane provides cloud telephony to businesses: SIP trunking and telephone numbers (DIDs) through its platform "Trustane Switch", plus hosted call-centre software and AI voice agents. Trustane is a foreign voice service provider. It does not hold STIR/SHAKEN credentials (an SPC token) and relies on its upstream U.S. providers to authenticate calls. It certifies under Option 3, with no STIR/SHAKEN implementation, as a foreign provider.

> Status at filing: Trustane Switch is launching. Up to now it has carried only Trustane's own test calls. The controls in sections 2 to 6 are built into the platform and apply to every customer call from the first one. Controls marked "planned" are not yet in place.

2. Know your customer

- No customer can place a call or buy a number until a Trustane administrator approves the account. Before approval, every call is refused ("Account not verified").
- The administrator reviews the customer's identity and business before approving. An administrator can also let an account in without this check. Every such override is recorded with who allowed it and why.
- Customers must accept Trustane's Terms of Service and Acceptable Use Policy. These forbid unlawful robocalls, calls without the consent the law requires, caller ID spoofing, and fraud.
- Planned: automated identity and business-registry verification during sign-up, as a second check before the administrator's approval.

3. Caller ID

- By default, a customer can send as caller ID only a number it holds on Trustane Switch, or a number it has proven it controls through Trustane's call-code verification. Otherwise the trunk's default caller ID is used. If there is none, the call is refused.
- Sending caller IDs the customer has not verified is possible only on wholesale trunks that an administrator has approved one by one. Before approving such a trunk for a customer that is itself a voice service provider, Trustane checks that the customer is listed in the Robocall Mitigation Database. Trustane does not accept calls from providers that are not listed.

- Numbers that are not valid E.164 numbers are rejected.
- Planned: blocking of invalid, unallocated and Do-Not-Originate numbers.

4. Volume and destination limits

- Every customer account starts with three limits, which the switch checks on every call: at most 20 calls at the same time, at most 5 new calls per second, and at most US$200 of call charges per day. Once the daily limit is reached, the account's further calls that day are refused. A trunk can be set lower than its account. Only a Trustane administrator can raise an account's limits.
- By default an account can call only the United States and its own home country. Calls to any other country are refused unless that country is added to the account. Premium-rate, satellite and shared-cost number ranges are blocked for every account.
- The switch checks every account's traffic every 30 seconds. If an account makes more than 600 call attempts within one minute, it is automatically throttled to 1 new call per second for one hour, and Trustane's administrator is alerted at once.

5. Monitoring and automatic action

Automated rules check every account's traffic and alert Trustane's administrator:

- more than 70% short-duration calls within an hour;
- answer rate below 5% within an hour (standard accounts);
- more than 600 call attempts within one minute (the account is also throttled, see section 4);
- 30 or more calls to the same number within 10 minutes;
- a first call to a new country;
- spending above US$150 per hour (alert), or above US$400 per hour for standard accounts (the account is blocked automatically).

Wholesale accounts, which an administrator approves one by one, are watched by all the other rules.

An administrator can suspend any account at once, and its new calls are refused within seconds. Accounts are also suspended automatically when the spending block rule triggers, or after seven days with a negative balance.

6. Customer responsibilities

- Customers are responsible for having the consent the law requires (including under the TCPA) for the calls they place, for honouring do-not-call requests, and for respecting calling-hour rules.
- Trustane's hosted call-centre software keeps each customer's do-not-call lists and a Trustane block list.
- Callbacks that Trustane's AI voice agents book are placed within the customer's set calling hours, in the called person's local time. A callback that falls outside those hours waits for the customer's approval. When a called person asks not to be called again, the AI agent adds the number to the customer's do-not-call list (on by default).

- Trustane Switch itself does not scrub calls against the National Do Not Call Registry. Customers must do so where the law requires it.

7. Traceback and cooperation

- Trustane keeps a detailed record of every call for two years. The record holds the account, trunk, source IP, caller ID, called number, time, upstream carrier and result. For any number and time, Trustane can therefore identify the customer that placed the call.
- Trustane commits to respond fully and within 24 hours to traceback requests from the Commission, law enforcement and the industry traceback consortium (the Industry Traceback Group). Requests go to the robocall mitigation contact above.
- When Trustane identifies or is notified of unlawful robocall traffic, it suspends the responsible customer's calling at once, investigates, and terminates the customer where the traffic was unlawful. It also blocks traffic when the Commission requires it to.
- Trustane cooperates with the Commission, law enforcement and the traceback consortium in investigating and stopping unlawful robocalls.

8. Review

This program is reviewed at least once a year and whenever Trustane's services change. Changes to its RMD filing are made within 10 business days, and the filing is recertified every year by 1 March.

Abhishek Kumar
Proprietor, Trustane
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