ROBOCALL MITIGATION PROGRAM DESCRIPTION

FCC Robocall Mitigation Database | Draft for factual verification | November 3, 2026

NOT READY FOR CERTIFICATION: This working draft describes the business structure reported by the filer and identifies required controls that must be verified and documented before an officer signs. Bracketed items are not established facts.

Filing entity	[Insert exact legal entity name as shown in FCC CORES]
FCC Registration Number (FRN)	0039118047
Business role	Non-facilities-based retail interconnected VoIP reseller (subject to confirmation)
Upstream platform	CoreDial / SkySwitch (specific contracting legal entity to confirm)
Responsible compliance contact	[Name, title, business email, telephone, address]
Document owner / adoption date	[Authorized officer / date formally adopted]

1. Scope and service model

The filer reports that it supplies retail hosted voice service to business customers using a white-label CoreDial/SkySwitch platform. The filer reports no company-owned or company-operated SIP servers, session border controllers, PSTN gateways, or independent STIR/SHAKEN signing infrastructure. The upstream platform and associated providers perform the hosted call-processing, number-provisioning, PSTN connectivity, and caller-ID authentication functions. The exact division of contractual and operational responsibility must be confirmed in writing with the upstream provider.

2. Basis for non-implementation of STIR/SHAKEN

The filer proposes to identify a lack of control over the network infrastructure necessary to implement STIR/SHAKEN, as described in 47 CFR 64.6305(d)(2)(i), as the basis for its non-implementation explanation. The filer does not claim a separately granted extension under 47 CFR 64.6304 without supporting evidence. It does not possess or control the network elements used to generate STIR/SHAKEN authentication signatures and relies on the upstream provider for call origination and authentication. This operational explanation does not, by itself, establish that the filer is legally excused from implementation; the classification and supporting facts must be confirmed against 47 CFR 64.6301 and applicable FCC orders.

Before certification, obtain and retain a dated statement from the upstream provider identifying its legal name, STIR/SHAKEN role, authentication method, which calls it authenticates, and whether the filer has any delegated control or authentication obligation. [Upstream written confirmation: NOT YET PROVIDED.]

3. Customer identification and due diligence - details required

The FCC requires specific reasonable steps for screening new and renewing customers and compliance with customer-knowledge obligations, including 47 CFR 64.1200(n)(4), as applicable. The filer must describe the steps it actually performs. Complete and substantiate the following before submission:

a. [Specify how legal business name, physical address, contact identity, and authorization to use calling numbers are verified.] b. [Describe review of expected call volumes, calling patterns, lawful calling purpose, consent practices, and higher-risk use cases.] c. [Describe review on renewal, material service changes, or suspicious-traffic alerts.] d. [Name the records kept, retention period, responsible role, and action taken when validation fails.]

4. Upstream-provider diligence - details required

[Insert contracting CoreDial/SkySwitch entity and any identified underlying originating providers.] [State how the filer verifies each relevant provider's RMD listing, business identity, regulatory contact and STIR/SHAKEN responsibilities, and how often those checks occur.] [Describe the written escalation contacts and process to review provider notices or suspicious traffic.]

5. Traffic analytics, detection, and blocking - details required

[Identify each analytics system used by the filer or upstream platform, its operator, and any third-party analytics vendor by name. State whether the filer has its own dashboard or receives alerts from the upstream platform.] [Describe actual signals used to detect anomalous or illegal traffic, e.g., high-volume bursts, high complaint rates, invalid caller-ID use, or traceback alerts, only where verified.] [Describe who can suspend customers, block calls, limit traffic, and preserve logs.] If the filer uses no analytics system directly, say so explicitly and document the upstream system rather than claiming unverified capabilities.

6. Complaints, enforcement, and suspected illegal traffic

[Describe actual intake and investigation workflow for customer complaints, upstream notices, abuse reports and traceback referrals. Identify the person who reviews such reports, investigates account and call records, contacts the upstream provider, and decides on customer suspension or termination where warranted.] The filer will cooperate in investigating and stopping illegal robocalls and will not knowingly permit its service to be used for such traffic.

7. Traceback response commitment

The filer commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium and to cooperate in investigating and stopping illegal robocallers that use its services to originate calls. Before certification, establish a monitored contact and escalation process capable of meeting this deadline, including outside normal business hours. [Traceback mailbox / telephone / primary / backup / escalation and log-retention procedure: TO BE COMPLETED.]

8. Governance, records, and filing updates

[Identify the compliance officer, review cadence, internal record retention, documented customer and provider reviews, and evidence of mitigation actions.] The filer will review material operational changes and update RMD filings within the time required by 47 CFR 64.6305(d)(5), and comply with annual recertification requirements under 47 CFR 64.6305(h). Any regulatory-action disclosures must match the entity and affiliate history confirmed during filing.

9. Required validation before uploading as a final plan

Confirm the legal filing entity and all contact details; confirm the voice-service-provider role; obtain upstream STIR/SHAKEN documentation; implement and accurately describe customer due diligence; identify upstream-provider checks; document analytics and vendor names; document abuse controls; operationalize a continuously monitored 24-hour traceback response; verify any relevant enforcement-history disclosures; obtain review and approval from an authorized officer and telecommunications regulatory counsel. Remove this draft warning and replace bracketed text only with verified operations.

Regulatory reference materials

47 CFR 64.6305(a), (d)(1)-(5), (h); 47 CFR 64.1200(n)(4); FCC RMD Filing Instructions (https://www.fcc.gov/sites/default/files/rmd-instructions.pdf); FCC Public Notice DA 26-72 (January 22, 2026). The FCC filing

instructions URL did not permit direct retrieval during preparation; this draft also uses the current rule text and FCC notices.