ROBOCALL MITIGATION PLAN

Company Name: IPSTELECOM LLC

FRN: 0039165774

FCC Form 499 Filer ID: In process

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Company Status

IPSTELECOM LLC is a newly established telecommunications company currently in the pre-operational phase. The company is completing carrier onboarding, regulatory compliance requirements, network configuration, and service deployment activities prior to commencing commercial operations.

As of the date of this filing, IPSTELECOM LLC has not commenced commercial voice operations and is not currently originating, terminating, or transiting customer voice traffic.

The company has established the policies, procedures, and compliance controls outlined in this Robocall Mitigation Plan in preparation for the launch of telecommunications services.

STIR/SHAKEN Implementation Status

IPSTELECOM LLC is actively pursuing implementation of the STIR/SHAKEN framework in accordance with FCC requirements and industry best practices.

The company is currently completing the necessary onboarding and authorization processes, including obtaining the required industry credentials, OCN registration, STI-PA access, and STIR/SHAKEN certificate provisioning.

Until STIR/SHAKEN implementation is completed, IPSTELECOM LLC relies on robust robocall mitigation procedures, customer verification processes, traffic controls, and compliance monitoring measures to prevent illegal robocalls and caller ID spoofing.

Upon completion of the required onboarding processes, the company will activate STIR/SHAKEN call authentication and apply attestation levels in accordance with ATIS standards, STI-GA governance requirements, and applicable FCC regulations.

Planned Attestation Framework

Full Attestation (A-Level)
Applied when IPSTELECOM LLC has a direct relationship with the customer, has verified the customer's identity, and has confirmed the customer's right to use the calling number.

Partial Attestation (B-Level)
Applied when the source of the call can be authenticated but authorization to use the telephone number cannot be independently verified.

Gateway Attestation (C-Level)
Applied when calls originate from sources where caller identity verification is unavailable or limited.

Interim Monitoring Procedures

Until STIR/SHAKEN deployment is completed, all future traffic will be subject to enhanced monitoring and compliance review. Traffic identified as suspicious, potentially spoofed, unlawful, or inconsistent with customer profiles may be blocked, restricted, investigated, or terminated.

Business Model & Network Role

IPSTELECOM LLC intends to operate as a wholesale and business telecommunications service provider.

Planned services include:

- Wholesale Voice Services
- SIP Trunking
- Business Voice Communications
- Carrier Interconnection Services
- Telecommunications Platform Services

Because commercial operations have not yet commenced, actual traffic volumes and customer distribution data are not currently available. Operational metrics and traffic classifications will be reviewed and updated as services become active.

Robocall Mitigation Program

IPSTELECOM LLC has implemented the following policies and procedures to prevent illegal robocalls, caller ID spoofing, and unlawful telecommunications activity.

1. Know Your Customer (KYC) Procedures

Prior to service activation, customers may be required to provide:

- Business registration documentation
- Government-issued identification
- Tax identification information where applicable

- Proof of authority for authorized representatives
- Additional information necessary for compliance review

Enhanced due diligence may be conducted for higher-risk industries or use cases.

Service may be denied or terminated if customer information cannot be adequately verified.

2. Traffic Monitoring & Analytics

Upon commencement of operations, IPSTELECOM LLC will implement continuous monitoring of network traffic to identify potentially unlawful activity, including:

- Abnormal call volume spikes
- Excessive short-duration calls
- Sequential dialing patterns
- Auto-dialing indicators
- Caller ID anomalies
- Suspicious traffic behavior

Automated alerts and compliance reviews will be utilized when unusual activity is detected.

3. Call Blocking & Filtering

The company reserves the right to block, reject, suspend, or terminate traffic that appears fraudulent, spoofed, unlawful, or inconsistent with customer authorization.

Traffic may be restricted where:

- Caller ID spoofing is detected
- Illegal robocall activity is suspected
- Regulatory violations are identified
- Customer verification cannot be completed

4. Do-Not-Originate (DNO) Protection

IPSTELECOM LLC intends to utilize available industry resources and internal controls to identify and block:

- Invalid telephone numbers
- Unallocated numbering resources
- Spoofed caller IDs
- Numbers identified through applicable Do-Not-Originate programs

5. Traceback Cooperation

IPSTELECOM LLC will cooperate fully with legitimate traceback requests from regulators, carriers, law enforcement agencies, and authorized industry traceback organizations.

The company will:

- Investigate traceback inquiries promptly
- Identify responsible customer accounts where applicable
- Preserve records relevant to investigations
- Respond within applicable regulatory timeframes

6. Upstream Provider Compliance

The company intends to utilize reputable and compliant upstream providers that maintain robocall mitigation programs and comply with applicable industry standards.

Preference will be given to providers that support STIR/SHAKEN implementation and traceback cooperation initiatives.

7. Customer Compliance & Enforcement

All customers will be required to comply with:

- FCC regulations
- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Applicable Do-Not-Call requirements
- Company Terms of Service
- Acceptable Use Policy

Violations may result in:

- Immediate suspension
- Traffic blocking
- Service termination
- Reporting to appropriate authorities where required

8. Record Retention

The company will maintain records necessary for compliance and traceback purposes, including:

- Customer onboarding documentation
- Service agreements
- Call Detail Records (CDRs)
- Compliance investigation records

Records will be retained for a minimum of two (2) years or longer where required by law or regulation.

9. Regulatory Compliance

IPSTELECOM LLC is committed to compliance with all applicable FCC regulations relating to robocall mitigation, call authentication, caller ID integrity, consumer protection, and telecommunications operations.

This Robocall Mitigation Plan will be reviewed periodically and updated as operations expand and regulatory requirements evolve.

Network Security & Traffic Controls

IPSTELECOM LLC maintains policies and procedures designed to protect network integrity and prevent misuse of telecommunications services.

Where policy violations are identified, the company reserves the right to:

- Suspend services immediately
- Restrict or block traffic
- Conduct compliance investigations
- Permanently terminate customer accounts

Certification

I certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge and reflects the current operational and compliance status of IPSTELECOM LLC.

Submitted By:
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