Robocall Mitigation Plan – Smart Building Technology

Smart Building Technology Pty Ltd · FRN 0039200977 · Version 1.0 · 14 November 2026

1. Company overview

Smart Building Technology Pty Ltd ("SBT", FRN 0039200977) is an Australian company that provides wholesale voice services. SBT files in the Robocall Mitigation Database as a foreign voice service provider and a non-gateway intermediate provider.

Item	Detail
Legal name	Smart Building Technology Pty Ltd
Registered address	Unit 32, 2 Slough Avenue, Silverwater NSW 2128, Australia
Website	smartbuildingtechnology.com.au
FRN	0039200977
Provider role	Foreign voice service provider; non-gateway intermediate provider
Services	SIP trunking, wholesale outbound termination, DIDs, and resale of voice services to business customers and other providers
Customers	Businesses and licensed or registered voice providers. SBT does not serve residential consumers.

SBT has no US-based facilities and does not act as a gateway provider. SBT hands all US-bound traffic to US providers that are themselves listed in the Robocall Mitigation Database.

2. STIR/SHAKEN status

SBT has not yet implemented STIR/SHAKEN. Until it does, SBT relies on the robocall mitigation program in this plan.

SBT is working towards signing its own calls. The steps are a USAC Form 499 Filer ID, an OCN, and an SPC token from the STI Policy Administrator. Once SBT has a certificate, it will sign all calls it originates with US (NANP) caller ID, and it will update this filing within 10 business days.

Until then, SBT will only send US-bound calls to downstream providers that are listed in the Robocall Mitigation Database. SBT will not ask any downstream provider to sign its calls with full (A-level) attestation unless SBT has verified that the customer has the right to use the caller ID number.

3. Know-your-customer and upstream vetting

No customer can send traffic until SBT has completed the checks below. SBT repeats them every year and whenever a customer's ownership or traffic profile changes.

1. **Identity and company checks.** SBT collects the customer's legal name, registration number, registered address, website, and the names of its directors or principals. SBT checks these against the public company register in the customer's country, such as ASIC, Companies House or a US Secretary of State.
2. **Robocall Mitigation Database check.** If the customer is a voice provider, it must appear in the Robocall Mitigation Database before SBT accepts its traffic. SBT rechecks this listing every month. SBT also checks that the provider has not been removed from the database or named in an FCC enforcement action.
3. **Use-case review.** The customer describes its traffic: what the calls are for, the destinations, the expected volumes, and the caller IDs it will use. SBT refuses traffic for any purpose that is unlawful in the destination country.
4. **Caller ID rights.** The customer must prove that it holds or is authorised to use every caller ID it presents, for example with carrier invoices or a letter of authorisation. SBT blocks calls with caller IDs that have not been verified, or that are invalid, unassigned or on a do-not-originate list.
5. **Consent for automated calls.** A customer sending prerecorded or artificial-voice calls must confirm in writing that it has the consent the law of the destination country requires. In the US that means the Telephone Consumer Protection Act (TCPA). On request, the customer must provide proof of that consent.
6. **Payment and ownership.** SBT accepts payment only from accounts in the customer's own name. SBT refuses customers that hide their ownership or that appear to be a re-registration of a provider SBT has already removed.

New customers start with lower limits on simultaneous calls and calls per second. SBT raises these limits only after 30 days of clean traffic.

4. Traffic monitoring

SBT watches customer traffic for the patterns that point to illegal robocalls. When a threshold below is crossed, the account is flagged for review by a person the same business day.

Signal	Threshold that triggers review
Short calls	More than 40% of answered calls last under 6 seconds
Low answer rate	Answer rate below 15% over 24 hours
Sudden volume spike	Daily volume more than 3× the customer's 7-day average
Caller ID changes	One caller ID used for more than 300 calls a day, or many caller IDs rotating across one campaign
Invalid caller IDs	Any calls with invalid, unassigned or do-not-originate caller IDs (these are blocked automatically)
Complaints	Any traceback request, carrier complaint or consumer complaint about the customer

SBT keeps call detail records for at least 24 months. These records let SBT answer traceback requests and look back over a customer's history.

5. Response to suspected illegal traffic

SBT stops suspect traffic first and investigates after.

1. **Suspend.** When traffic looks illegal, SBT suspends the affected trunk, caller IDs or campaign straight away. Suspected fraud or impersonation of a government agency, bank or other business is suspended within 1 hour.

2. **Investigate.** SBT asks the customer for evidence that the traffic is lawful: consent records, caller ID authorisation, and call scripts. The customer has 2 business days to reply.
3. **Decide.** If the customer cannot show the traffic is lawful, SBT ends the service and notifies any downstream provider involved. Repeat or serious cases are terminated permanently and the customer cannot sign up again.
4. **Report.** SBT reports confirmed illegal traffic to the Industry Traceback Group and, where it applies, to the FCC or the regulator in the destination country.

SBT will block any traffic the FCC identifies in a notice under 47 CFR 64.1200, and will report what action it took within the deadline that notice sets.

6. Traceback cooperation

SBT responds fully to every traceback request from the FCC, law enforcement and the Industry Traceback Group within 24 hours.

SBT's response identifies the upstream source of each call: the customer or provider that sent it to SBT. SBT gives full details of that source and the action SBT has taken. Where SBT carries traffic for other providers, its contracts require each of them to answer SBT's traceback requests within 24 hours too.

Robocall mitigation contact	Details
Name	Mohammed Nager
Title	Director
Email	mohammed@smartbuildingtechnology.com.au
Phone	+61 424 649 188
Address	Unit 32, 2 Slough Avenue, Silverwater NSW 2128, Australia

7. Contracts, records and review

- **Contracts.** Every customer agreement bans illegal robocalls and spoofed caller ID. Customers must keep the consent records the law requires and must cooperate with traceback. SBT can suspend or end the service immediately if a customer breaks

these terms.

- **Records.** SBT keeps KYC files, call detail records, traceback responses and enforcement actions for at least 24 months.
- **Updates.** SBT updates its database filing and its FCC CORES record within 10 business days of any change. SBT recertifies the filing every year by March 1.
- **Review.** The director reviews this plan at least once a year and whenever the FCC changes its rules.

Certification. I certify that this plan describes the robocall mitigation practices SBT actually follows, and that the information in it is true and correct.

Mohammed Nager, Director, Smart Building Technology Pty Ltd — Signature: Mohammed Nager — Date: 14/11/2026