Robocall Mitigation Plan

47 C.F.R. § 64.6305 · Robocall Mitigation Database

First Class Services LLC d/b/a GlobaleSIM · Princeton, Texas · FRN 0036692085 · Form 499 Filer ID 839483

Contact: Nelson Caseiro, Owner · compliance@globalesim.tel · 940-999-0777 · Effective November 18, 2026

1. The company and its role in the call path

First Class Services LLC ("the Company") is a domestic provider of interconnected VoIP service under the GlobaleSIM Phone brand, offering personal lines and hosted business phone systems (extensions, auto-attendant, voicemail) to individuals and small businesses in the United States. The Company began offering service in November 2026. It is an **originating voice service provider**: its customers place calls through the Company's hosted PBX, and the Company sends them to the public telephone network through a single upstream provider, Telnyx LLC (RMD-listed). The Company does not accept call traffic from other providers, does not offer wholesale, SIP-trunking or termination service to other carriers, and does not carry traffic for foreign providers. It has no affiliates and no foreign ownership.

2. STIR/SHAKEN status

Calls originated by the Company are sent over IP to Telnyx LLC. The Company does not yet hold its own Service Provider Code (SPC) token: it received its FCC Form 499 Filer ID on November 18, 2026, has not yet filed an annual FCC Form 499-A (the first is due April 1, 2027), and has not yet been assigned an Operating Company Number. It therefore cannot yet meet the STIR/SHAKEN Governance Authority's Token Access Policy and relies on the extension for providers that cannot obtain an SPC token. The Company will (a) obtain an OCN, (b) register with the STIR/SHAKEN Policy Administrator and obtain its own SPC token and certificate as soon as it is eligible, (c) arrange for all of its originated calls to be signed with its own certificate (directly or through Telnyx), and (d) update this filing within 10 business days of any change. Until then, every call it originates is subject to the robocall mitigation program below.

3. Know your customer (KYC)

Every new customer is checked before any line can place calls:

- The customer creates an account with a verified email address (a one-time code is emailed at each sign-in) and pays through PayPal or an invoiced business account; the customer's name and billing details are kept with the account.
- A full U.S. service address (name, street, city, state, ZIP) is required and registered for 911 before a line is activated.
- Every customer must accept the Company's Terms of Service and Acceptable Use Policy, which prohibit robocalls, autodialed or prerecorded calls without consent, caller ID spoofing, telemarketing in violation of the TCPA, Telemarketing Sales Rule and Do-Not-Call rules, and any illegal calling; acceptance is recorded with date, version and IP address. Violation ends service.
- The owner reviews each new account, including every new business account, during its first days of service while new-account limits apply. The Company does not sell to call centers, lead generators, autodialer or "voice broadcast" services, and declines customers whose stated use, payment details or identity do not match. Discrepancies are investigated, and the account is refused or closed if they cannot be resolved.

- New accounts are limited for their first 7 days (minutes and calls per day), and the system alerts the owner if an unusual number of new lines are created in 24 hours.

4. Preventing illegal calls on the network

- **No spoofing:** the Company's server sets the caller ID of every outgoing call to a telephone number assigned to that customer's own account. Customers cannot choose or insert another caller ID.
- **Rate limits per line:** each line is limited in new calls per 10 minutes and calls per day; calls above the limit are refused.
- **Automatic robocall detection:** a line that places many short calls to many different numbers in a short window is automatically suspended, and the owner is alerted immediately. It stays off until the owner reviews it.
- **Master shutoff:** if total outgoing traffic across the network exceeds set limits (minutes per hour or day, or calls per 10 minutes), all outgoing calling stops automatically until reviewed. Incoming calls and 911 continue to work.
- **No international calling:** calling is limited to the U.S. and Canada, which removes most toll-fraud and international robocall risk.
- **Monitoring:** call records (numbers, times, durations, quality) are kept for every call and reviewed; a daily security report and real-time alerts go to the owner.
- **Upstream protections:** Telnyx LLC applies its own robocall mitigation, call analytics and blocking to calls the Company sends.

5. Response to illegal calls, complaints and tracebacks

The Company commits to respond **fully and within 24 hours** to all traceback requests from the Commission, civil and criminal law enforcement, and the Industry Traceback Group, and to cooperate with them in investigating and stopping any illegal calls that use its network. Traceback requests and robocall complaints can be sent to compliance@globalesim.tel or 940-999-0777, which is monitored 24/7.

- When the Company learns of a suspected illegal call from its network (traceback, complaint, alert from Telnyx, or its own monitoring), it identifies the originating line from its call records, suspends outgoing calls on that line at once, investigates, and terminates the customer if the calls were illegal.
- The Company will act on any notification from the Commission under 47 C.F.R. § 64.1200(n) and will block or cease accepting traffic as required.
- Records of each investigation are kept for at least 2 years.

6. Responsibility and updates

Nelson Caseiro, Owner, is responsible for this plan. The Company will update its Robocall Mitigation Database filing within 10 business days of any change to its information or to this plan (including obtaining an SPC token), and will recertify annually as required. The Company has not been the subject of any FCC, law enforcement or state attorney general action or investigation related to illegal robocalling or spoofing.