Robocall Mitigation Plan

Company: Shineway International Group Limited
Date: Nov 20, 2026
FCC FRN: 0039275656

1. Introduction and STIR/SHAKEN Status

Shineway International Group Limited ("Shineway") is a foreign voice service provider headquartered outside the United States. Shineway does not operate any network infrastructure within the U.S., does not control the U.S. network elements necessary to implement STIR/SHAKEN, and does not have direct access to U.S. numbering resources.

Accordingly, Shineway is exempt from the STIR/SHAKEN implementation obligation under 47 CFR § 64.6304. All U.S.-bound calls originated by Shineway are delivered to U.S.-based gateway/terminating providers who are responsible for authenticating the calls. Nevertheless, Shineway maintains this Robocall Mitigation Plan to apply commercially reasonable efforts to mitigate illegal robocall traffic.

2. Know Your Customer (KYC) and Customer Vetting

Shineway applies a KYC process for downstream customers prior to service activation. This generally includes:

Entity Verification: Collection and review of basic corporate registration information.

Use Case Review: Assessment of the intended traffic profile based on information provided by the customer.

Contractual Safeguards: Execution of service agreements that require customers to comply with applicable anti-robocall laws and prohibit the use of our services for illegal activities.

3. Caller ID (CLI) Validation and Anti-Spoofing

Shineway does not intentionally originate calls with spoofed Caller ID. We require downstream customers to demonstrate legitimate authorization for any U.S. numbers used as Caller ID. Where technically feasible, traffic with unverified or unauthorized numbers is blocked at our network gateway.

4. Traffic Monitoring and Analytics

Shineway utilizes call analytics systems and periodic traffic reviews to help identify suspicious activity, including:

Abnormal short-duration, high-frequency call patterns.

Unusual Answer Seizure Ratio (ASR) or Average Call Duration (ACD).

Sudden traffic spikes from a single source.

When suspicious traffic is flagged, Shineway will conduct an investigation and may suspend the implicated route or customer pending resolution.

5. Commitment to Traceback and Cooperation

Shineway commits to respond to traceback requests from the FCC, U.S. law enforcement, and the Industry Traceback Group (ITG) within 24 hours of receipt. We will cooperate in investigating and stopping illegal robocallers that use our service.

Designated Point of Contact for Traceback:

- **Name:** Jackson Loh
- **Title:** Technical Director
- **Email:** support@shinewaye.com
- **Phone:** +85284008946

6. Remediation and Suspension

Upon notification or detection of illegal robocall activity, Shineway will take prompt action. Such actions may include:

- Blocking the implicated trunk or route.
- Suspending or terminating the customer's service.
- Notifying upstream providers as necessary.

7. Record Keeping and Updates

Shineway maintains call detail records (CDRs) and related logs to support traceback investigations. This Robocall Mitigation Plan will be reviewed and updated as required by FCC rules.