



Robocall Mitigation Plan

This robocall mitigation plan is for Stratus Networks, Inc., with headquarters at 416 Main St. Suite 601 Peoria, IL 61602.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

Stratus Networks, Inc. has not been prohibited from filing a certification in the Robocall Mitigation Database.

Stratus Networks, Inc. does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Stratus Networks, Inc. uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

Stratus Networks utilizes advanced call software analytics to monitor all inbound calls. This technology automatically alerts us if any incoming call originates from a number that invalid, unallocated or listed on the do-not-originate (DNO) registry. By integrating these analytics into our system, we can proactively detect and address potentially fraudulent or unauthorized calls, ensuring tht our network is protected against illegal robocalls.

In accordance with the Commissions’s directive in Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59 (Rel. May 19 2023) 49-51, Stratus Networks provide the following information concerning its upstream voice service carriers.

Stratus has the four upstream providers from which is received voice traffic:

1. Peerless Networks, Inc.
433 W. Van Buren
Suite 410S
Chicago IL 60607
Christopher McDonald
2. Inteliquent, Inc., DBA Onvoy, Sinch (Vitelity’’)
550 W. Adams St
Suite 900
Chicago IL 60661
Kyle McGinnis
3. Bandwidth
900 Main Campus Drive
Suite 100
Raleigh NC 27606
4. Call Tower
10701 River Front Parkway
4th Floor
South Jordan, UT 84095
United States
5. i3 Broadband
602 High Point Lane East
Peoria, IL 61611

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination and termination of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do-Not-Originate (DNO) list.

We perform the above mitigation steps for all outbound calls.

We immediately investigate any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 495J. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.