

101VOICE Robocall Mitigation Program Description STIR/SHAKEN Compliance Program
Updated Feb 15, 2025

Call Authentication Mechanisms:

IT Management dba 101VOICE (101VOICE) implemented call authentication mechanisms STIR/SHAKEN (Secure Telephone Identity Revisited/Signature-based Handling of Asserted information using tokens) by obtaining its own certificate using Sansay Inc. The recurring monthly services include STI-AS which provides 101VOICE with call authentication on our originating calls; STI-VS services to provide call verification to verify legitimacy of terminating calls; and STI-CA certificate authority to provide STIR/SHAKEN certificates to sign calls. The 101VOICE network facilities are 100% IP. Beginning in June 2021, the company certified with the FCC that 101VOICE was in compliance with STIR/SHAKEN program requirements, after receiving its own Certificate Authority, and based upon our relationship with and reliance upon Bandwidth.com as its primary carrier to provide ingress and egress with the public switched telephone network, thus providing a multi layer of protection for our STIR/SHAKEN call treatment. Every call, either inbound or outbound, relies on Sansay provided technology services and 101VOICE's Certificate Authority to verify the authenticity of caller IDs to distinguish legitimate calls from spoofed or fraudulent ones.

At 101VOICE, for "Know Your Customer" (KYC) protocols in compliance with 47 CFR 64.1200(n)(3), we implemented stringent measures to verify the legitimacy of our customers before activating telecom services. Our KYC procedures are designed to prevent fraudulent activities, ensure compliance with regulatory requirements, and maintain the integrity of our services. Below is a summary of our approach:

1. Customer Identity Verification
 - New customers are required to provide valid business registration documents, such as Articles of Incorporation, business licenses, or IRS Employer Identification Numbers (EIN).
 - For individual or sole proprietorship accounts, we request government-issued identification, such as a driver's license or passport.
2. Business Validation
 - We verify the business's legitimacy using publicly available databases, such as Secretary of State records and third-party business verification services (e.g., Dun & Bradstreet, Experian Business, or Equifax Business).
 - Our team conducts domain and email verifications to confirm business authenticity.
3. Credit and Financial Checks
 - We perform internal credit assessments on new customers to evaluate their financial stability before approving service activation.
 - For our business customers, we assess trade references and may request a financial guarantee or deposit if necessary.
4. Physical Address and Contact Validation
 - We confirm service locations using third-party mapping tools and customer-provided utility bills or lease agreements when applicable.
 - Customer contact numbers and emails are verified through direct engagement before onboarding.
5. Fraud Prevention and Risk Analysis
 - We implement risk assessment models that flag high-risk sign-ups based on historical data patterns.
 - Our system monitors usage patterns post-activation to detect anomalies that may indicate fraudulent activity.



6. Compliance and Ongoing Monitoring

- 101VOICE follows STIR/SHAKEN protocols to prevent robocall fraud and ensure caller ID integrity.
- We maintain continuous compliance checks on customers through periodic account reviews and audits.

Robocall prevention

101VOICE has policies in place and enforced that apply to all customers to prohibit potential robocallers, and mechanisms implemented to detect violation of the 101VOICE Acceptable Use Policy (AUP). The 101VOICE AUP policy prohibits excessive use, short duration calls, machine to machine calling including autodialing, predictive-dialing, robo-dialing, excessive faxing, excessive texts and SMS messaging. 101VOICE policies and systems prohibit and prevent ID spoofing, forged email addresses or headers that could be used to mislead others as to the identity of the sender or the origin of any communication made using 101VOICE services. Reasonable use limits are established, in place, and monitored to automatically trigger appropriate actions if signs of potential violation of policies are identified up to and including denying access to 101VOICE services.

Real-time Call Blocking:

101VOICE has Implemented real-time call blocking mechanisms to prevent suspicious calls before they reach consumers through use of our Certificate Authority and Verification Services managed by Sansay Inc, along with comparable services provided by 101VOICE's upstream providers Bandwidth.com, VOIP Innovations, Intelpeer, and our own internal monitoring and systems management.

Regulatory Compliance:

101VOICE works to ensure compliance with all relevant regulations such as the Telephone Consumer Protection Act (TCPA) and other national or regional laws governing telecommunications. All calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2).

101VOICE is committed to respond within 24 hours to all traceback requests from the FCC, law enforcement and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use 101VOICE services to originate calls, in compliance with 64 CFR § 6305(d)(2)(iii).

101VOICE maintains open and active communications with upstream providers in compliance with 64 CFR § 6305(d)(2)(ii). The 101VOICE upstream providers are:

- Bandwidth.com Tel.855-864-7776; email: support@bandwidth.com
- Voip Innovation Tel.877-478-647; email: support@voipinnovations.com
- Intelpeer Tel.866-780-8639; email: support@intelepeer.com

IT Management Corporation, including all of it's registered business names, has not been the subject of a formal Commission, law enforcement, or regulatory action or investigation due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, in compliance with Federal Code of Regulations 64 CFR § 6305(d)(2)(iv).



IT Management dba 101VOICE commits to and confirms the Company will update changes to its plan within ten (10) business days of any change to the information in this program description, in compliance with Title 47 CFR § 64.6305(c)-(d).

Company information

IT Management Corporation dba 101VOICE is a California corporation.

Contact information:

IT Management Corporation dba 101VOICE
3300 Central Expressway
Santa Clara, CA 95051
Tel. 888-970-2070
Fax. 888-506-0606
Email: compliance@101voice.com

By signing this document, I acknowledge the above information is accurate and that my organization will comply with all FCC, TCPA, and Do Not Call regulations in the use of 101VOICE services.

Officer signature:

Name: Peter Geddis

Position: COO



Signature: _____

