

Succeed, Inc. – Robocall Mitigation Policy

Succeed, Inc. is a fixed wireless broadband, data, and interconnected VoIP provider serving customers primarily in Northern California. Succeed utilizes VoIP Innovations, Inc. (Sangoma) as its underlying carrier for SIP trunking and PSTN interconnection for all originating and terminating voice traffic. VoIP Innovations provides STIR/SHAKEN authentication services. Succeed relies on its underlying carrier for call authentication and ensures that all outbound traffic is routed through authenticated trunks in accordance with FCC rules.

1. General Prohibition Against Illegal Robocalling

Succeed's services are subject to its Acceptable Use Policy (AUP). Prohibited uses associated with robocalling include unlawful, deceptive, fraudulent, or abusive calling practices. Succeed reserves the right to suspend or terminate services that violate its AUP or applicable law.

2. Know Your Customer Procedures

Succeed maintains a Know Your Customer (KYC) process for all business VoIP customers. Customer onboarding may include verification of identity, business purpose, contact information, and intended calling patterns. Succeed establishes reasonable call path limits and monitors for abnormal usage patterns to prevent mass robocalling.

3. Call Monitoring and Traffic Analytics

Succeed monitors call traffic patterns and investigates unusual call behavior. Accounts exhibiting suspicious or high-risk traffic may be restricted, suspended, or subject to further verification.

4. Traceback Cooperation

Succeed will respond promptly to traceback requests from the FCC, law enforcement, and the Industry Traceback Group. Succeed will provide call detail records and cooperate with investigations to mitigate illegal robocalls.

5. STIR/SHAKEN Implementation

Succeed relies on VoIP Innovations (Sangoma) for STIR/SHAKEN authentication. All outbound traffic is routed through authenticated trunks. Succeed monitors its carrier's compliance and maintains policies to ensure calls are transmitted in accordance with STIR/SHAKEN obligations.

6. Mitigation Updates and Compliance Review

Succeed periodically reviews industry best practices and FCC guidance to update its robocall mitigation procedures. Policies are reviewed and updated as necessary to maintain compliance with Robocall Mitigation Database certification requirements.