

CallerReady LLC

Robocall Mitigation Program Description

12-30-2024

Office of the Secretary

Federal Communications Commission

45 L Street NE, Washington, DC 20554

ATTN: Enforcement Bureau – Telecommunications Consumers Division

Subject: Robocall Mitigation Program Description

Provider Name: CallerReady LLC

FCC Registration Number (FRN): 0031091341

To Whom It May Concern,

This document provides a description of the robocall mitigation program implemented by CallerReady LLC, as required under 47 CFR § 64.6305 (a) and (d)(ii)-(iii).

STIR/Shaken Implementation

CallerReady implements STIR/SHAKEN call authentication for all originated voice traffic and all calls it originates are compliant with § 64.6301(a)(1), (2) and (3):

- (1) CallerReady does not transit calls exclusively on our network. As an over-the-top provider we always originate calls through another voice service provider;
- (2) CallerReady authenticate caller identification information for all SIP calls it originates and that it will exchange with another voice service provider or intermediate provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next voice service provider or intermediate provider in the call path; and
- (3) CallerReady verifies caller identification information for all SIP calls it receives from another voice service provider or intermediate provider which it will terminate and for which the caller identification information has been authenticated.

CallerReady makes every reasonable effort to comply with STIR/SHAKEN by ensuring every outbound call it originates is legitimate calling and is not a robocall. All calls originated are IP based and the calls it originates are attested at either the A or B STIR/SHAKEN attestation level. Our primary carrier switch

signs the calls at the A level based on verifying control of the caller/from numbers and CallerReady's attestation that its Know Your Customer (KYC) controls are in place.

Our fallback carrier switches will terminate at either the A attestation level if they are the Resp.org for the caller/from number or at the B attestation level if they are not the Resp.org for the caller/from number based on CallerReady's procedures for ensuring each client controls the caller from numbers used and our KYC controls.

For inbound calls to the telephone numbers we provision and sell to our customers, CallerReady receives the attestation level from the upstream provider and offers a means of blocking calls by STIR/SHAKEN status that is configurable by the customer.

Know Customer (KYC) and TCPA Compliance Controls

CallerReady's Know Your Customer controls are comprised of CallerReady's procedures for ensuring each client controls the caller from numbers used and that we sufficiently know the customer with regards to our contracts, the client's TCPA and calling compliance attestations, and the ability to contact the customer.

CallerReady attests that it knows its customers with regard to collecting and validating contact information, collecting customer attestation they will not use the system to make illegal robocalls, collecting federal taxpayer identification numbers and collecting additional voluntary information items including customer web site URL, social media handle, and their Dun and Bradstreet DUNS number. Our customers sign agreements attesting they are in full compliance with the Telephone Consumer Protection Act (TCPA) provisions regarding their consent and permission to make each call.

Contractual Provisions

All customers agree to contractual obligations and remedies that include:

- **Prohibited Uses:** Robodialers are strictly disallowed on our network.
- **TCPA Compliance:** CallerReady customers must attest that all outbound calls they make using the CallerReady system have the appropriate user opt-in consent for making such calls per the Telecommunications Protection Act.
- **Fraud Detection Systems:** CallerReady utilizes automated systems to detect and prevent illegal robocall activity originating from or traversing our network.
- **Violations:** Any violations of these terms results in termination of the services agreement.

Robocall Detection and Mitigation Procedures

- CallerReady performs continuous monitoring of call patterns using automated systems to detect anomalies and volume representative of illegal robocalling including high call volumes, short duration calls, and invalid called numbers.
- CallerReady monitors new customers for fraudulent use of the system.
- CallerReady investigates and takes corrective actions as warranted on all customer complaints

Commitment to All Traceback Requests

CallerReady certifies that it commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium with 24 hours of receiving requests, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Certification

In the past, CallerReady had qualified for the Small Voice Provider extension under § 64.6304 (a)(1) Extension of implementation deadline exempt from the requirements of § 64.6301 through June 30, 2023 due to having fewer than 100,000 voice service subscriber lines.

This document outlines our present compliance with 47 CFR § 64.6305(d)(ii)-(iii) and provides a clear framework for addressing illegal robocalls.

CallerReady certifies that we adhere to the robocall mitigation practices described above. We are committed to preventing the origination and transport of illegal robocalls in compliance with FCC regulations.

Contact Information

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Sincerely,

Joseph A. Charlson

CEO & Managing Member

CallerReady LLC