



Foremost Cloud Services, Inc.
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Robocall Mitigation Program

Foremost Cloud Services currently uses the Foremost Telecommunications OCN 319D (FRN #0010601185) network exclusively and does not have its own OCN/SPID or codes. Future plans are for Foremost Cloud Services to obtain its own OCN/SPID and codes but this is not the case currently.

Foremost network is subject to a robocall mitigation program and has taken the following reasonable steps to avoid the origination, carrying, and/or processing of illegal robocall traffic including but is not limited to the following:

1. TransNexus technology is used to monitor outbound SIP traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reports identifying suspected illegal robocalls and includes calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Foremost examines the reports and investigates identified calls to determine if there are attempts to originate unlawful robocalls.
2. Foremost Cloud Services commits 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 illegal robocallers that use our service to originate, carry, or process illegal robocalls.
3. Foremost Cloud Services is a small-enough company that we are able to maintain close relationships with the majority of our customers and to date we have not had any known issues with illegal robocall traffic. Foremost requires signed contracts to provide service along with contact, entity type and details including tax number. 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. Foremost reviews any customer (new or otherwise) that seeks access to high-volume origination services and will refuse the request if necessary or add additional conditions for service as necessary.
4. Foremost Cloud Services will suspend and/or disconnect customers determined to be originating illegal robocall traffic.
5. Foremost Cloud refuses traffic from any provider that is not listed in the Robocall Mitigation Database.

Additional Information

1. Foremost Cloud Services performs the following roles in the call chain: A Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users.
2. Foremost Cloud Services has not been prohibited from filing a certification in the Robocall Mitigation Database.
3. Foremost Cloud Services does not have a history of law enforcement, regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
4. Robocall Mitigation Primary Point of Contact: Lawrence F. Halcomb, Director
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STIR/SHAKEN Implementation Status/Exemptions

Foremost Cloud Services filed the STIR/SHAKEN implementation extension as a small voice service provider provided by 47 C.F.R. Section 64.6304(a). All Foremost Cloud Services customers use the Foremost Telecommunications network exclusively. As of June 2023, Foremost implemented STIR/SHAKEN for its outbound SIP traffic.

Foremost has portions of its network that cannot support STIR/SHAKEN. As provided by 47 C.F.R. Section 64.6304(d), non-SIP traffic does not require STIR/SHAKEN implementation for those portions of the network which cannot initiate, maintain, carry, process, and terminate SIP calls. Foremost continues to avail itself to the extension provided under 47 C.F.R. Section 64.6304(d) for these portions of our network. Foremost will implement a solution for these portions of its network once a protocol is fully developed and finalized by industry standards and the necessary equipment and software are available on the commercial market.