

Robocall Mitigation Plan for Holistic Practice Management LLC

FCC FRN: 0031361389

Operating Company Number: 533L

Implementation Status: Complete STIR/SHAKEN Implementation

Holistic Practice Management LLC provides interconnected VoIP services to end users using upstream carrier infrastructure provided by Bandwidth Inc.

Holistic Practice Management LLC has obtained OCN 533L, authorization through the STI Policy Administrator, and its own STIR/SHAKEN certificate issued by Telonium. HPM's certificate is deployed through Bandwidth's Hosted Signing Service and is actively assigned to HPM's United States outbound voice traffic.

HPM uses STIR/SHAKEN authentication for calls originating through its IP voice service. Attestation is applied in accordance with HPM's relationship with the customer and authorization to use the originating telephone number. HPM also provides reception services in which authorized staff may place calls using telephone numbers belonging to HPM's practice clients.

Robocall Mitigation Measures

- HPM verifies the identity and business purpose of customers during onboarding.
- HPM maintains records of customer telephone numbers and authorization to originate calls using those numbers.
- HPM limits its voice services to legitimate business customers and does not knowingly provide service for illegal robocalling or spoofing.
- HPM monitors call activity and investigates anomalous or potentially abusive calling patterns when identified.
- HPM maintains procedures to restrict, suspend, or terminate service when illegal or noncompliant calling activity is identified.
- HPM cooperates with the FCC, law enforcement agencies, the Industry Traceback Group, and other appropriate entities investigating illegal robocall activity.
- HPM will respond fully and within 24 hours to traceback requests from the FCC, law enforcement, or the Industry Traceback Group.
- HPM maintains customer and call-account information sufficient to assist in tracing originating traffic and identifying the responsible customer.
- HPM reviews its STIR/SHAKEN and robocall mitigation practices as its services, network arrangements, or regulatory requirements change.

STIR/SHAKEN Implementation

HPM's STIR/SHAKEN certificate is issued under OCN 533L and is deployed through Bandwidth's Hosted Signing Service. Bandwidth performs the technical signing function using HPM's certificate for HPM's applicable outbound voice traffic.

HPM maintains responsibility for the accuracy of its customer information, authorization to use originating telephone numbers, its robocall mitigation program, and compliance with applicable FCC requirements.

Robocall Mitigation Contact

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