

End2End Communications, LLC

Robocall Mitigation Plan

The FCC requires all voice service providers to certify their STIR/SHAKEN compliance status in the Robocall Mitigation Database.

End2End Communications has developed the following Robocall Mitigation Plan to:

1. Describe the reasonable steps we take to prevent the origination of illegal robocalls
2. Demonstrate our commitment to cooperating with traceback requests and enforcement efforts
3. Certify our mitigation practices in the Robocall Mitigation Database

Steps We Are Taking

Customer Screening

End2End Communications provides hosted PBX and SIP-based voice services to small and medium-sized businesses throughout California. As part of our onboarding process, we evaluate each prospective customer to ensure their intended use aligns with our service model. This helps us identify and avoid high-risk traffic sources, such as outbound call centers or entities engaged in high-volume automated dialing.

To establish service, customers must provide:

- Legal Business Name
- DBA (if applicable)
- Primary and Secondary Contacts
- Tax Identification Number
- Service Address
- Nature of Business

Our Terms & Conditions explicitly prohibit robocalling, spam calling, and any calling practices restricted by law. Violations may result in immediate suspension or termination of service.

Services and Controls

To reduce the likelihood of illegal robocalls originating from our network, End2End Communications employs the following measures:

1. We work closely with our upstream carriers to ensure STIR/SHAKEN authentication is applied to all outbound calls until we implement full in-house signing capabilities.

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2. We provide call-screening and call-blocking tools to all customers, enabling them to block unwanted inbound calls based on caller ID.

3. Outbound call capacity is allocated based on the number of user seats purchased. This prevents customers from operating mass-dialing systems commonly associated with illegal robocalling. Requests for additional call paths require justification and are reviewed for legitimacy. Suspicious requests are denied.

Monitoring

End2End Communications monitoring its calls to identify unusual or potentially harmful calling patterns. Indicators include, but are not limited to:

- Sudden spikes in outbound call volume
- Low call completion ratios
- Extremely short call durations
- Repetitive dialing behavior

Any activity flagged as suspicious is logged and investigated promptly. If a customer is found to be originating illegal robocalls, outbound calling privileges will be immediately suspended, and the incident will be reported to the appropriate authorities.

Traceback and Enforcement

End2End Communications fully cooperates with the Industry Traceback Group (ITG), the FCC, law enforcement, and other authorized entities in efforts to identify and stop illegal robocalling. We commit dedicated resources to ensure timely and complete responses to traceback requests.

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