

To Whom It May Concern,

Legacy SIP commits to respond to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium within required timeframes, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

All voice traffic from Legacy SIP is delivered over upstream providers that implement STIR/SHAKEN and maintain their own robocall mitigation programs. All calls that Legacy SIP originates for its customers are subject to Legacy SIP's robocall mitigation program described below.

Legacy SIP relies on a combination of strict firewall rules on provisioning servers, use of isolated IP segments where applicable, and strict rules with upstream carriers limiting the number of channels, minutes, and connections, with automatic alerts to network operations if there is any sudden or concerning traffic pattern. In addition, Legacy SIP hard-codes all outbound DIDs for each customer account to prevent outbound caller-ID spoofing.

Legacy SIP does not operate network infrastructure capable of performing STIR/SHAKEN itself and therefore relies on its underlying carriers to sign and verify calls. Legacy SIP takes the following steps in connection with STIR/SHAKEN and caller identity:

In addition, Legacy SIP hard code all outbound DIDs in an effort to prevent outbound spoofing.

Legacy SIP takes the following steps to comply with STIR/SHAKEN protocol:

1. Utilize underlying carriers to sign all outbound calls with certificates
2. CallerID configurations limited to the TNs assigned to the account
3. TNs assigned to the account are only TNs that have been purchased/procured through the same underlying carriers
4. Signatures are verified on Inbound calls by the underlying carriers
5. Certifies that it commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls
6. Offers call blocking features to end-users to further mitigate inbound robocalls
7. Able to fully trace any calls terminated from Legacy SIP

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Legacy SIP