



April 1, 2024

Robocall Mitigation Program Description

As a small PBX provider, our mitigation program is as follows:

- We verify that any carrier we do business with has implemented STIR/SHAKEN compliance on all trunks and numbers they provide us. We are not interested in doing business with unknown or shady carriers.
- We exclusively provide PBX services to small and medium enterprises.
- Although toll services are provided to our customers as part of normal business office telephony, toll calling is not our primary source of business. It is not our policy to pursue high-volume, low-price call origination or termination business. It is not cost-effective to run robocalls through our service.
- We do not offer services to organizations that perform outbound telephone marketing (whether legal or no), as this is not business we are interested in.
- Sign-up for our services is always done through a hands-on sales and engineering team, and our services are focused on typical PBX functionalities. We do not offer any sort of product that would be useful for robocalling.
- We have automated throttles in place to limit the amount of traffic a customer may place, which are far below any limits that would be useful to a robocall campaign.
- Our carriers also have throttles in place to limit the amount of calls which can be sent through our trunks. This ensure that even if one of our systems were compromised, the impact would be low as the total number of calls that could be processed would be negligible.
- On receipt of any traceback request, a priority repair will be initiated in our ticketing system, escalated to the on-call supervisor, and handled as soon as practical (within 24 hours)

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