



Robocall Mitigation Plan

Company Name: Peace Communications LLC.

Company Address: 1100 Central Avenue, Chattanooga, Tennessee 37403

Company Phone#: 833-872-4746

Pursuant to 47 C.F.R. § 64.6305, Peace Communications, LLC (Peace Communications) submits this report concerning its compliance with the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the reasonable steps, practices and procedures Peace Communications has in place to mitigate illegal robocalls as of February 23, 2024. Peace Communications may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs. Peace Communications will update this Plan within ten (10) business days following the date of any changes to the Plan.

STIR/SHAKEN Implementation Status: As of February 23, 2024, Peace Communications has SIP traffic on its network.

The current status of its STIR/SHAKEN implementation is:

- ☒ My traffic is fully attested.
- ☐ My traffic is partially attested.
- ☐ None of my traffic is attested yet

Peace Communications is judiciously working to prevent unlawful robocalls from originating on its network and has installed new STIR/SHAKEN authentication architecture which the company uses to authenticate calls originated by its customers. In addition to completing implementation of the STIR/SHAKEN authentication framework within its network, Peace Communications has implemented the following robocall mitigation plan to address unlawful robocall traffic:

Terms of Use/Acceptable Use Policies: Peace Communications has enforceable terms of use and/or an acceptable use policy noted in its customer contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. The policies prohibit the use of the services in any way that is unlawful, harmful to, or interferes with, the company's network, or the network of any other provider, interferes with the use or enjoyment of the services received by others, constitutes Spam/Email/Usenet abuse, a security risk, or a violation of privacy.



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In addition to general prohibited conduct, the policies prohibit the use of the services to transmit any material that intentionally or unintentionally violates any applicable laws, rules or regulations, and the use of the services to violate the CAN-SPAM Act of 2003, the Telephone Consumer Protection Act, the Do-Not-Call Implementation Act, or any other similar applicable law, regulation, or rule.

Customer Vetting Process: Prior to installing services for new customers, or renewing contracts with existing customers, the company takes the following measures to identify end users that could potentially generate robocall traffic:

The Company confirms the following information for its new and renewing customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls
- Service Address
- Credit History
- Business Incorporation Documents and Business History

Upstream Provider Vetting Process: Prior to accepting traffic from upstream providers, Peace Communications obtains their contact information and confirms their STIR/SHAKEN implementation status in the FCC's Robocall Mitigation Database. To the extent possible, Peace Communications also obtains escalation lists (i.e., a list of contacts within the upstream provider's organization to which issues should be escalated for resolution).

Peace Communications obtains SIP connectivity to the PSTN exclusively through three providers: Bandwidth.com, Sinch, and Commio.

The Master Services Agreement with Bandwidth.com incorporates by reference Bandwidth.com's Acceptable Use Policy available online at: <https://www.bandwidth.com/legal/acceptable-use-policy/>. The Bandwidth.com Acceptable Use Policy clearly prohibits use of the service for any purpose that is illegal, inappropriate, or improper ("Prohibited Activities"). Such Prohibited Activities include (1) violating any law, rule, regulation, governmental orders, industry standards or guidance, (2) transmitting unsolicited materials, e-mail or information, (3) falsifying or providing misleading information, and (4) engaging in repetitive and/or continuous calling, including calls initiated through automated means, among others. The Bandwidth.com Master Services Agreement has been in place since June 2019.



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The Master Services Agreement with Sinch, subjects all use of Sinch's services to compliance with all applicable laws and regulations.

Commio's customers must adhere to their AUP: <https://www.commio.com/aup/> this AUP subject all use of Commio services to compliance with all applicable laws and regulations.

Authentication, Monitoring and Mitigation: Peace Communications has established methods and procedures to monitor its network and detect / prevent fraudulent activity. The company uses call authentication, call labeling, and call blocking services to protect its networks and consumers from harmful calls. It also uses software to monitor its network's daily usage and has established methods and procedures in place to address issues as soon as they are identified. Peace Communications also uses the TransNexus, Clear-IP call analytics systems for real-time robocall monitoring and mitigation.

Traceback Commitments and Processes: Peace Communications commits to respond fully within 24 hours 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.

Peace Communications Operations team will address traceback requests. It either has provided the ITG with the contact information and business hours for that team or will do so upon receipt of the first request from the ITG. See - <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>.

If a pattern of questionable activity is detected, Peace Communications will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated. Requests from the ITG must be submitted in writing and include the following information:

Company Name:

Company Address:

Requestor's Name:

Requestor's Title:

Requestor's phone number:

Requestor's e-mail:



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Peace Communications will cooperate with state and federal regulators to prevent all illegal robocalls. Requests from the valid agency must be submitted in writing and include the following information:

Law Enforcement Agency Name:

Agency Address:

Requestor's Name:

Requestor's Title:

Requestor's phone number:

Requestor's e-mail:

Peace Communications will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities and are committed to implementing any mandated robocall mitigation procedures to the fullest extent possible.

Ownership and Management Information: Carmen Peace has majority ownership and managing control of Peace Communications LLC and its' subsidiary, Peace Communications Huntsville, LLC. James Peace, CEO and President, has significant control of Peace Communications LLC and its' subsidiary, Peace Communications Huntsville, LLC.