

Robocall Mitigation Program Description

Provider Name: Aluma Tel

Certification Filing Date: December 10, 2024

Overview:

Aluma Tel is a small VoIP provider utilizing Vitelity as our DID provider. Our network and processes are designed to prevent the origination of illegal robocalls and to ensure compliance with applicable regulations, including 47 CFR § 64.6305(a).

1. Call Volume Monitoring and Blocking:

- Monitoring: All call traffic originating from our network is continuously monitored by our internal VoIP servers and Vitelity. This monitoring includes tracking call volume, duration, and patterns to identify anomalous or suspicious traffic.
- Blocking Mechanisms: Any call origination patterns flagged as suspicious are immediately blocked by our servers or Vitelity's monitoring systems to prevent potential illegal robocalls.

2. Customer Verification:

- Verification Process: All customers are thoroughly verified during the onboarding process. Verification includes:
 - Valid business licenses.
 - Social Security Numbers (SSNs).
- Customer Integrity Checks: This process ensures only legitimate businesses and individuals gain access to our services, minimizing the risk of misuse.

3. Network Security:

- Firewalls: All VoIP servers are protected behind enterprise-grade firewalls to prevent unauthorized access and malicious activities.

- VPN Connections: All endpoints on our network communicate through secure VPN connections, ensuring encrypted transmission of call data and user credentials.

- Incident Response and Recovery:

- In the event of a confirmed incident involving illegal robocall activity, the affected server and IP are immediately shut down.

- The impacted customer is migrated to a new server and IP address using a verified, uncorrupted backup.

4. Call Record Management:

- Record Retention: Complete call detail records (CDRs) for all incoming and outgoing calls are securely maintained. These records include metadata necessary for traceback requests and investigative purposes, ensuring transparency and accountability.

- Data Security: Call records are stored securely on encrypted storage systems to protect customer data and prevent unauthorized access.

5. Traceback Compliance:

- Commitment to Cooperation: Aluma Tel is committed to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the industry traceback consortium.

- Proactive Measures: We actively cooperate with these entities in investigating and stopping illegal robocallers who may attempt to use our services.

6. Auditing and Recurrent Training:

- Call Audits: Monthly audits are conducted to review call patterns and ensure compliance with robocall mitigation measures.

- Employee Training: All employees are trained on compliance processes during onboarding, with recurrent training sessions conducted every six months to stay current with industry best practices and regulatory updates.

7. Additional Information:

- Principals, Affiliates, and Subsidiaries: Aluma Tel has no principals, affiliates, or subsidiaries.
- Prior Regulatory Actions: Aluma Tel has never been the subject of any formal FCC, law enforcement, or regulatory agency action or investigation related to robocalls.

8. Certification of Compliance:

Aluma Tel certifies compliance with the robocall mitigation requirements under 47 CFR § 64.6305(a). This includes implementing reasonable steps to avoid originating illegal robocall traffic, maintaining robust network security, responding promptly to traceback requests, and cooperating fully with investigations.

9. Officer Declaration:

I, Nick Lasko, in my capacity as President of Aluma Tel, hereby certify under penalty of perjury that:

1. Compliance Statement: Aluma Tel has implemented and is adhering to a robocall mitigation program as described herein, consistent with the requirements of 47 CFR § 64.6305(a).
2. Cooperation Commitment: Aluma Tel will fully and promptly respond to all traceback requests from the FCC, law enforcement, or the industry traceback consortium within 24 hours and will cooperate in investigations to stop illegal robocallers using our services.
3. Accuracy of Information: All information provided in this filing is true and accurate to the best of my knowledge, information, and belief.
4. Acknowledgement of Responsibility: As President of Aluma Tel, I understand that non-compliance with these obligations may result in removal from the FCC's Robocall Mitigation Database.

Officer's Name: Nick Lasko

Officer's Title: President

Date: December 10, 2024

Signature: 