



## Florida Telephone Services, LLC

### Robocall Mitigation Program Description

**Entity Name:** Florida Telephone Services, LLC

**Implementation Status:** Fully STIR/SHAKEN Compliant

#### 1. Program Overview

Florida Telephone Services, LLC ("the Company") is a voice service provider committed to the highest standards of network integrity. As a fully STIR/SHAKEN compliant provider, the Company authenticates all originating SIP traffic. This Robocall Mitigation Program (RMP) serves as an additional layer of protection, utilizing rigorous vetting and monitoring to ensure the Company's network is not used to originate illegal robocalls, as required by 47 C.F.R. § 64.6305.

#### 2. Know Your Customer (KYC) Protocols

The Company maintains a high-trust onboarding process focused on service-based businesses, primarily within our local headquarters market.

- **Identity Verification:** The Company collects and verifies the legal entity name, physical business address, and Tax ID (EIN) for every customer.
- **Service Context:** The Company serves legitimate, service-based businesses. During onboarding, the Company verifies that the customer's business profile aligns with conversational or legitimate service-related traffic.

#### 3. Number Integrity and Authorization

- **Letter of Authorization (LOA):** For all ported numbers, the Company requires a signed LOA and proof of ownership.
- **Right to Use:** The Company only grants STIR/SHAKEN "Level A" attestation when it has verified the customer's legal right to use the specific telephone numbers associated with the outbound traffic.

#### 4. Technical Constraints and Traffic Monitoring

The Company employs specific technical barriers to prevent automated abuse:

- **Prohibition of Dialers:** The Company strictly prohibits the use of auto-dialers, predictive dialers, or any automated dialing software.
- **Real-Time Analytics:** The Company monitors Call Detail Records (CDRs) for signatures indicative of illegal robocalling, including high-volume bursts, low Call Completion Rates (CCR), and unusually short call durations.

#### 5. Enforcement and Traceback Cooperation

- **Immediate Mitigation:** If traffic monitoring detects unauthorized dialer activity or "robocall-like" patterns, the Company reserves the right to immediately throttle or suspend the account.
- **Traceback Commitment:** Florida Telephone Services, LLC fully cooperates with the Industry Traceback Group (ITG) and law enforcement. The Company commits to providing a substantive response to all traceback requests within **24 business hours**.

#### 6. Certification and Database Maintenance

The Company re-certifies this program annually by **March 1st**. In compliance with FCC regulations effective February 2026, the Company ensures all contact information and program details in the Robocall Mitigation Database are updated within **10 business days** of any material change.