

Robocall Mitigation Plan for VoIP Services

Submitted to the FCC by Sprinter IT, LLC

Introduction

Robocalls are unwanted, automated calls that often use spoofed caller ID information to deceive consumers. They are a major source of consumer complaints and a potential threat to public safety. The Federal Communications Commission (FCC) has adopted rules to combat robocalls and require voice service providers to implement the STIR/SHAKEN caller ID authentication framework by June 30, 2021. The FCC also requires voice service providers to file a robocall mitigation plan that describes the steps they are taking to prevent illegal robocalls from originating on their networks.

SPRINTER IT, LLC is a voice service provider that offers VoIP services using 3cx and bandwidth.com and Flowroute.com SIP. We are committed to protecting our customers and the public from illegal and unwanted robocalls. This document outlines our robocall mitigation plan, which includes the following components:

- Implementation of STIR/SHAKEN
- Monitoring and analysis of call traffic
- Identification and mitigation of suspicious calls
- Cooperation with law enforcement and industry partners
- Consumer education and protection

Implementation of STIR/SHAKEN

STIR/SHAKEN is a set of technical standards that enable voice service providers to verify the caller ID information of calls that traverse different networks. It uses digital certificates to attest to the level of confidence in the caller ID information. STIR/SHAKEN helps reduce spoofing and restore trust in caller ID.

SPRINTER IT, LLC has implemented STIR/SHAKEN on our network and is capable of signing and verifying calls using the STIR/SHAKEN protocol. We use bandwidth.com as our SIP trunking provider, which is also STIR/SHAKEN compliant. We have configured our 3cx system to send and receive the SIP Identity header that contains the STIR/SHAKEN information. We have obtained the necessary certificates from an authorized certification authority and have registered with the FCC's Robocall Mitigation Database.

Monitoring and analysis of call traffic

SPRINTER IT, LLC monitors and analyzes the call traffic that originates and terminates on our network. We use various tools and methods to detect and measure the volume and patterns of calls, such as:

- Call detail records (CDRs)
- Call analytics software
- STIR/SHAKEN attestation levels

- Customer feedback and complaints

We use these data sources to identify any anomalies or spikes in call volume, frequency, duration, or destination. We also compare the caller ID information with the STIR/SHAKEN attestation levels to determine the level of confidence in the caller ID information. We flag any calls that have a low or partial attestation level, or that have a mismatch between the caller ID information and the certificate.

Identification and mitigation of suspicious calls

SPRINTER IT, LLC identifies and mitigates any calls that are suspected of being illegal or unwanted robocalls. We use the following criteria to identify suspicious calls:

- Calls that have a high volume, frequency, or duration
- Calls that have a low or partial STIR/SHAKEN attestation level
- Calls that have a mismatch between the caller ID information and the certificate
- Calls that have a spoofed or invalid caller ID information
- Calls that have a high rate of consumer complaints or feedback

We use the following methods to mitigate suspicious calls:

- Blocking calls that are confirmed to be illegal or fraudulent
- Labeling calls that are likely to be illegal or unwanted with a warning message
- Notifying customers of suspicious calls and giving them the option to block or report them
- Tracing the origin of suspicious calls and notifying the upstream provider
- Updating our call blocking and labeling rules based on the latest robocall trends and threats

Cooperation with law enforcement and industry partners

SPRINTER IT, LLC cooperates with law enforcement and industry partners to combat robocalls and protect consumers. We participate in the following initiatives and activities:

- Sharing information and best practices with other voice service providers and industry associations
- Reporting illegal or fraudulent robocalls to the FCC, FTC, and other relevant authorities
- Responding to law enforcement requests for information or assistance in robocall investigations
- Supporting the development and adoption of industry standards and solutions to prevent and mitigate robocalls

Consumer education and protection

SPRINTER IT, LLC educates and protects our customers from robocalls and their potential harms. We provide the following resources and services to our customers:

- Informing customers about the nature and risks of robocalls and how to avoid them
- Providing customers with tools and options to block or label robocalls on their devices

- Encouraging customers to report robocalls to us and to the FCC's Consumer Complaint Center
- Updating customers on the latest robocall trends and threats and how to protect themselves