

Robocall Mitigation Policy

For Systems & Software USA, Inc d/b/a Connetrix
Updated 2024-04-28

The goal of this policy is to establish and follow a policy that is compliant with [47 CFR § 64.6305](#)

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Voice Service Providers must implement a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- 1) Detail the reasonable steps taken to avoid originating illegal robocalls
- 2) Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- 3) is filed in the Robocall Mitigation Database.

STIR / SHAKEN OBLIGATIONS: These are managed via our relationship with Sangoma/VoipInnovations who is the upstream VoIP provider for Connetrix. Through this relationship Connetrix relies on the procedures, policies and mitigation techniques to ensure our customers are adequately protected from Robocalls and Spoofing.

KNOW YOUR CUSTOMER: Connetrix utilizes the mitigation technique of “Know Your Customer.” As we maintain a close relationship with its subscribers. Its customers are generally small business users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling. As Connetrix does not provide “naked” VOIP services, we manage our clients PBX platforms that give us in-depth access to logs, reporting and notifications.

Connetrix monitors discrete calling levels based on customer size. The level referred to as “large volume calling capability” will be subject to change over time. Customer usage patterns are measured over time and their peaks are monitored and when thresholds reached they will be investigated and enforced if needed.

Connetrix screens all new customer requests when the service levels are at or above what we consider a large volume calling request. Our policies restrict customer turn up in the following manor:

- 1) We will not deploy large volume calling capability to unverified companies or individuals.
- 2) Businesses requesting large volume calling capability must provide verification as to the nature of the request
- 3) Principals of the organization are required to agree to our terms of services regarding abuse
- 4) A Connetrix representative generally maintains face-to-face onsite contact with clients over the course of the relationship.

Enforcement of Policy

All voice traffic provided generating from a subscriber is subject to the processes set forth in this mitigation plan.

Connetrix only offers bundled services that are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its TOS ("Terms of Service) requirements. Connetrix existing TOS prohibit activities normally associated with Robocalling including, but not limited to: 1) providing altered, deceptive, or false information about the identity of the sender or 2) a phone call violating any applicable local, state, or federal law or 3) in connection with any fraudulent activities.

Additionally, the our Company will regularly update our TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS. Our subscriber are made aware that Connetrix may take action up to suspension or termination of service for violation of the TOS.

Traceback and Enforcement Cooperation

Connetrix will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Connetrix will dedicate sufficient resources to provide prompt and complete responses