

INA, LLC Robocall Mitigation Plan

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our providers network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

- INA ports existing numbers to T1 carriers such as Inteliquent, and only originates or terminates calls with these T1 carriers, each of whom has implemented STIR/SHAKEN mitigation strategies.
- INA only serves small business customers with limited call paths.
- Enforce excess call limitations
- Randomly monitor call records for abnormalities
- Immediate suspension when abnormalities are found
- Customer vetting
- Immediately react to any complaints from upstream carriers by investigating and blocking calls from a customer found to be in violation