

# **Robocall Mitigation Plan for Adaptive Communications LLC**

## **Introduction**

Adaptive Communications LLC ("Adaptive"), a small Internet Service Provider (ISP) and retail voice provider in western Colorado, is committed to mitigating unlawful robocalls and complying with Federal Communications Commission (FCC) regulations. As a small provider, Adaptive relies on VoIP Innovations, a Sangoma company, for call termination services and STIR/SHAKEN attestation. This document outlines Adaptive's comprehensive Robocall Mitigation Plan, ensuring full compliance with the FCC's amended requirements under section 64.6305.

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## **1. Contact Information**

**Company Name:** Adaptive Communications LLC

**Address:** 2536 RIMROCK AVE STE 400-282, GRAND JUNCTION, CO 81505-8669

**Primary Contact Name:** Tracy Harmer

**Phone Number:** (307) 263-9530

**Email Address:** [tracyharmer@adaptive-communications.com](mailto:tracyharmer@adaptive-communications.com)

### **Principals, Affiliates, Subsidiaries, and Parent Companies:**

- Tracy Harmer, Member
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## **2. Implementation of STIR/SHAKEN Framework**

Adaptive Communications LLC complies with the STIR/SHAKEN call authentication framework through its partnership with VoIP Innovations. This partnership ensures that:

- All outbound calls are attested under the STIR/SHAKEN framework.
- Calls originating from our network are validated to verify caller identity and detect spoofed calls.
- Adaptive's customers benefit from the enhanced trust and call integrity provided by STIR/SHAKEN.

VoIP Innovations is responsible for generating and transmitting appropriate attestation levels (A, B, or C) for calls originated from our network, in compliance with industry standards and FCC guidelines. Adaptive confirms that no previous certification has been removed by Commission action.

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## **3. Robocall Monitoring and Mitigation**

Adaptive actively works to prevent illegal robocalls from originating or transiting through its network. Our approach includes:

- **Traffic Monitoring:**
    - Monitoring call patterns for anomalies, such as high call volumes to specific destinations or short-duration calls.
    - Investigating and addressing suspicious activity promptly.
  - **Customer Vetting:**
    - Verifying the identity of new customers and assessing the legitimacy of their intended usage.
    - Ensuring that customers agree to terms prohibiting illegal robocalling.
    - Taking reasonable steps to prevent new and renewing customers from originating illegal robocalls.
  - **Complaint Resolution:**
    - Providing a clear process for individuals to report suspected robocalls.
    - Investigating complaints and taking corrective actions, including termination of services for violators.
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#### **4. Call Analytics and Upstream Provider Procedures**

- **Call Analytics:**
    - Adaptive employs third-party call analytics systems provided by VoIP Innovations to detect and mitigate suspected illegal robocall traffic.
    - These systems analyze call patterns in real-time to identify potential violations.
  - **Upstream Provider Procedures:**
    - Adaptive ensures that all upstream providers comply with FCC regulations and maintain updated RMD certifications.
    - Periodic reviews of upstream providers' practices are conducted to verify compliance.
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#### **5. Compliance with FCC Requirements**

Adaptive complies with all FCC rules and regulations regarding robocall mitigation, including:

- Filing certification and supporting documentation in the FCC's Robocall Mitigation Database (RMD).
- Ensuring that all required information, including our role in the call chain and details of STIR/SHAKEN implementation, is provided and updated promptly.

- Affirming that neither Adaptive nor any affiliated entity has been subject to Commission or law enforcement action related to illegal robocalling, spoofing, or RMD certification deficiencies in the past two years.
  - Committing to respond fully to traceback requests within 24 hours.
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## **6. Future Enhancements**

Adaptive is committed to improving its robocall mitigation efforts over time. Planned enhancements include:

- Deploying advanced analytics tools to identify and block suspicious traffic more effectively.
  - Expanding customer education programs to raise awareness about robocalls and how to report them.
  - Strengthening partnerships with industry organizations and regulators to stay ahead of emerging robocall trends.
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## **7. Commitment to Correct Deficiencies**

Adaptive will respond promptly to any FCC notice of deficiency in its RMD certification. This includes:

- Updating RMD certifications and robocall mitigation plans to cure identified deficiencies.
  - Providing detailed explanations to the FCC regarding corrective actions taken.
  - Ensuring compliance within the specified timeframe to avoid removal from the RMD.
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## **Conclusion**

Adaptive Communications LLC is dedicated to protecting its customers and the public from the harm caused by illegal robocalls. Through robust partnerships, compliance with FCC regulations, and continuous improvement, Adaptive ensures a secure and reliable voice service for its customers.

### **Approval:**



Tracy Harmer  
Managing Member  
December 19, 2024