

Robocall Mitigation Plan

This robocall mitigation plan is for Copetek LLC, CSW Inc. , with headquarters at 11500 Olive Blvd, Suite 250, Creve Coeur, MO 63141.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- Our downstream carriers are Telnyx, and Vitelity.

Copetek LLC has not been prohibited from filing a certification in the Robocall Mitigation Database. Copetek LLC does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Copetek LLC uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We have established the following robocall mitigation practices to identify and prevent the origination of unlawful robocalls:

- Traffic Monitoring:
 - Continuous monitoring of outbound and inbound call traffic for unusual patterns indicative of robocalls.
- Caller ID Validation:
 - Verification of Caller ID information to ensure accuracy and compliance with FCC rules.
- Customer Vetting:
 - Strict onboarding processes for new customers, including validation of customer identities and intended use cases for voice services.
- Customer Limitation:
 - Automated outbound calls are not a feature available in the system.
- Call Analytics:
 - Deployment of advanced analytics tools to identify and block suspicious or high-volume robocall traffic in real time.
 - High volume of short-term calls is instantly identified.
- Collaboration with Industry and Law Enforcement:
 - Active participation in industry traceback efforts to identify and mitigate unlawful robocall sources.
 - Cooperation with the FCC and other regulatory bodies in investigations related to robocalls.

Compliance and Reporting

- Compliance Monitoring:
 - Regular audits of our voice network and customer traffic to ensure compliance with the FCC's robocall mitigation requirements.
- Reporting to the FCC:
 - Submission of required certifications and reports to the FCC, including updates to the Robocall Mitigation Database.

Customer Education

Copetek recognizes the importance of customer awareness in combating robocalls. To this end, we:

- Provide educational materials to customers on identifying and avoiding scam calls.
- Offer resources to report suspected robocalls.

Continuous Improvement

We are committed to continuously enhancing our Robocall Mitigation Program by:

- Staying informed on new technologies and industry standards for combating robocalls.
- Regularly reviewing and updating our mitigation practices to address emerging threats.
- Participating in industry forums and initiatives aimed at eradicating unlawful robocalls.

Implementation of STIR/SHAKEN

Copetek has implemented the following measures:

- STIR/SHAKEN Framework:
 - We have fully enabled the STIR/SHAKEN authentication and verification protocols for all customers locations via our Gateway provider which is Telnyx and Vitelity.
 - Calls originating from our network are authenticated with appropriate attestation levels.
 - Calls received from external networks are verified using STIR/SHAKEN tokens.

Contact Information for Robocall Mitigation Program

Name: Chad Cope

Title: President

Email: voip.fcc@copetek.com

Phone: 6363950384

By submitting this document, Copetek certifies compliance with the FCC's Robocall Mitigation Program requirements and affirms our commitment to preventing unlawful robocalls.