



Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
April 23, 2024	Stack8 Technologies (USA) Inc.	Version (V 2.0)

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

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

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on by Stack8 Technologies (USA) Inc, a Reseller providing services across North America and serves the mid-market enterprise space.

As a non-gateway intermediate provider that resells services, Stack8 does not have the infrastructure to implement Stir/Shaken which is implemented by its compliant Voice Service Providers.

General Prohibition Against Illegal Robocalling

Stack8's end user services 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 terms of service ("TOS") requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Stack8 service to engage in or in connection with fraudulent activities



In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

Stack8's end users are notified that Stack8 may take action up to suspension or termination of service for violation of the TOS.

Know Your Customer

Stack8 utilizes the mitigation technique of "Know Your Customer." Stack8 is a Unified Communications provider that maintains a close relationship with its subscribers. Its customers are well established Enterprise Commercial Clients whose Telephony needs are associated with knowledge workers who generate call volume of approximately 350 calling minutes per month per number. Through our CDR reporting, we can detect increased call volume outside this normal range and investigate if a significant number of calls are originating from a single number.

Stack8 does not accept clients with unjustified usage above our volume average. If we do receive such a request, then we:

- validate the nature of all of our clients.
- verify addresses to look for overlapping / multiple deployed voice path subscriptions
- validate the number of users at the location is appropriate for the volume of calling

Network Monitoring:

Stack8 enables alarms which triggers when a specific clients call volume reaches a specific threshold. Stack8 may suspend or terminate service if upon investigation it is deemed to be performing Robocalling activities.

Traceback and Enforcement Cooperation

Stack8 will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Stack8 will dedicate sufficient resources to provide prompt and complete responses to traceback requests.