

Robocall Mitigation Plan – NetDirective Technologies, Inc. (dba NetDirective Technologies, Inc.)

FCC FRN: 0027214352

Filing Category: Voice Service Provider – *Does not implement STIR/SHAKEN (Option 3)*

1. Overview

NetDirective Technologies, Inc. (dba NetDirective Technologies, Inc.) provides **white-label VoIP services** to business end-users in the United States. All calls are originated and terminated through our upstream carrier partner, **Inteliquent, Inc.**, which has fully implemented the STIR/SHAKEN framework in its IP network.

NetDirective Technologies, Inc. does not own or operate any switching facilities, SIP interconnects, or voice core infrastructure. All VoIP traffic flows directly from customer endpoints over the public internet to Inteliquent's network, where STIR/SHAKEN authentication is applied.

Accordingly, NetDirective Technologies, Inc. is not technically capable of implementing STIR/SHAKEN itself. Instead, we comply with 47 CFR § 64.6305(a)(2) by maintaining this Robocall Mitigation Plan, which describes the reasonable steps we take to prevent the origination of unlawful robocalls on our platform.

2. Robocall Mitigation Practices

NetDirective Technologies, Inc. employs the following measures to ensure that no unlawful or fraudulent robocall traffic originates from its end users:

a. Customer Vetting & Onboarding

NetDirective Technologies, Inc. requires all prospective customers to undergo a detailed **Know Your Customer (KYC)** review prior to service activation. As a small managed service provider serving mostly local small business customers, our process is intentionally hands-on and tailored to ensure that no anonymous or fraudulent entities obtain service through our platform.

- Customer Identity Verification
 - Staff meet each prospective customer in person prior to onboarding.

- Government-issued photo identification is reviewed for the business owner or authorized officer.
- Business legitimacy is confirmed through one or more of the following:
 - State corporate registration database (e.g., Sunbiz.org in Florida).
 - IRS-issued EIN confirmation letter or W-9 form.
 - Copies of utility bills or lease agreements showing business address.
- Business Use Case Validation
 - During onboarding, the sales team documents the customer's intended use of telephony services (e.g., internal office communications, customer service lines, outbound sales).
 - High-risk use cases such as outbound telemarketing, lead generation, or auto-dialing campaigns are not permitted.

b. Traffic Monitoring

- NetDirective Technologies, Inc. does not currently use a third-party analytics vendor for call pattern analysis. Instead, we rely on a layered approach:
 - **Upstream Carrier Analytics** – All traffic is delivered exclusively through our wholesale provider, Inteliquent, Inc., which applies STIR/SHAKEN authentication and operates call analytics systems to identify and block suspicious robocall traffic.
 - **Internal Account-Level Monitoring** – NetDirective reviews customer call usage monthly through reports provided by Inteliquent and internal account data. We look for red-flag indicators such as short-duration spikes, unusual volumes, or disproportionate outbound calling.
 - **Immediate Action** – Any traffic identified as suspicious is suspended pending review, and confirmed unlawful traffic results in termination of service and referral to law enforcement or the Industry Traceback Group.

c. Enforcement Actions

- Customers found to be originating unlawful robocalls will have service immediately suspended or terminated.
- NetDirective Technologies, Inc. will cooperate with the Industry Traceback Group (ITG) and law enforcement to investigate suspected illegal robocall activity.

d. Coordination with Upstream Provider (Inteliquent, Inc.)

- All traffic is delivered exclusively to Inteliquent, Inc., which performs STIR/SHAKEN attestation and signing and traffic analytic monitoring.
 - NetDirective Technologies, Inc. ensures contractual alignment with Inteliquent, Inc. to guarantee compliance with FCC robocall mitigation requirements.
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3. Compliance & Reporting

- NetDirective Technologies, Inc. maintains a designated compliance officer responsible for robocall mitigation oversight.
 - We promptly respond to traceback requests from the ITG, the FCC, or law enforcement agencies.
 - This mitigation plan will be updated as necessary to remain consistent with FCC rules and industry best practices.
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4. Contact Information

Compliance Contact:

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5. Certification

Pursuant to **47 CFR § 64.6305(a)(2)**, NetDirective Technologies, Inc. (dba NetDirective Technologies, Inc.) certifies that it has not implemented STIR/SHAKEN in its own IP network because it does not operate such a network. All VoIP traffic is authenticated by our upstream carrier (Inteliquent, Inc.). NetDirective Technologies, Inc. has adopted and

enforces this Robocall Mitigation Plan to ensure that no unlawful robocalls originate from its customers.