

In-Telecom Robocall Mitigation Plan

1. Regulatory Compliance and Policy Enforcement:

- Ensure compliance with FCC regulations, specifically the TRACED Act, regarding the implementation of STIR/SHAKEN caller ID authentication technology.
- Adhere to FCC guidelines and best practices for monitoring and mitigating robocalls.

2. Know Your Customer (KYC) Procedures:

- In-Telecom will continue to enhance its customer-onboarding process to include comprehensive verification of customer identity.
- Collect and verify customer-identifying information such as business name, physical location, federal tax ID number, and FCC Filer ID.

3. Traceback Cooperation:

- Commit to timely cooperation with Traceback requests from relevant authorities.
- Dedicate sufficient resources to respond promptly and comprehensively to law enforcement and government demands related to robocall investigations.

4. Robocall Mitigation Program:

- Utilize call analytics software provided by TransNexus to monitor outbound voice traffic in real-time.
- Implement mitigation measures to prevent the origination or transit of illegal robocalls, including identifying calls with poor reputation numbers or on Do Not Originate lists.
- Investigate suspicious calls promptly and take appropriate action, including warning or terminating service for customers found to be involved in unlawful robocall activities.

5. STIR/SHAKEN Implementation:

- Register with the STI-PA using OCN 604K and obtain a STIR/SHAKEN certificate from the TransNexus Certification Authority (STI-CA).
- Utilize the implemented STIR/SHAKEN solution from TransNexus to authenticate outbound calls.

6. Continuous Monitoring and Improvement:

- Continuously monitor outbound voice traffic and call authentication processes to ensure effectiveness in mitigating robocalls.
- Stay informed about evolving technologies and regulations related to robocall mitigation and adapt procedures accordingly.

7. Staff Training and Awareness:

- Provide training to staff members involved in customer onboarding, call monitoring, and investigation processes to ensure compliance with robocall mitigation protocols.

- Raise awareness among employees about the importance of robocall mitigation and their role in preventing illegal call activities.

By implementing this comprehensive Robocall Mitigation Plan, In-Telecom can demonstrate its commitment to preventing illegal robocalls and complying with regulatory requirements while protecting its customers and the public from robocall scams and harassment.