

SIP2020, LLC Robocall Mitigation Plan

Provider Name: SIP2020

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1. Company Overview

SIP2020 is a nationwide provider of SIP trunking, VoIP, and telecom services. We are committed to protecting the voice ecosystem from unlawful robocalls, scams, and fraud. Our focus is ensuring the calls that originate on or transit through our network are legal, authenticated, and trustworthy.

2. STIR/SHAKEN Implementation

- **Reseller Status:** SIP2020 is a reseller of voice services and does not originate traffic on facilities it controls. In accordance with 47 CFR § 64.6303, SIP2020 relies on its upstream carriers, Skyswitch and VoIP Innovations, who have fully implemented STIR/SHAKEN in their IP networks. SIP2020 therefore passes only traffic that has been authenticated at origination and meets the FCC's STIR/SHAKEN obligations
 - **Upstream Provider Reliance:** Both Skyswitch and VoIP Innovations have implemented STIR/SHAKEN on their networks, and SIP2020 relies on their authentication frameworks to ensure compliance for SIP-based traffic.
 - **Non-IP Interconnections:** For any traffic outside IP-based interconnections, SIP2020 continues to apply alternative mitigation practices as outlined in Section 3.
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3. Robocall Mitigation Practices

SIP2020 employs a multi-layered mitigation approach:

Customer Vetting (KYC – Know Your Customer)

- Verification of business identity (business license, tax ID, address validation).
- Screening against industry fraud databases and FCC enforcement lists.
- Prohibition of customers using SIP2020 services for illegal robocall campaigns.

Traffic Monitoring

- Along with our upstream carrier partners, we provide active analysis of call patterns. (high calls-per-second, abnormal short-duration calls, sequential dialing).
- Real-time alerts for suspicious activity.
- Blocking of known bad actors and high-risk call origination attempts.
- When suspected suspicious activity is detected, we will contact the customer within 24 hours for further investigation and possible action regarding their voice service.

Call Blocking

- Deployment of analytics to detect and block likely illegal robocalls.
- Participation in industry traceback and blocking coordination.
- Actively block suspect numbers at customer request within 24 hours.

Enforcement

- Immediate suspension or disconnection of customers found originating unlawful robocalls.
 - Contractual terms requiring compliance with FCC and industry robocall rules.
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4. Complaint Handling & Traceback Cooperation

- SIP2020 responds within **24 hours** to traceback requests from the Industry Traceback Group (ITG).
 - We maintain a dedicated email and phone number for consumer and carrier complaints.
 - All robocall complaints are logged, investigated, and resolved quickly.
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5. Ongoing Review & Staff Training

- Regular review of our robocall mitigation practices (at least quarterly).
- Updates made in line with FCC requirements and evolving industry standards.

- Internal compliance team trained on detection, enforcement, and traceback handling.
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6. Certification Statement

SIP2020 certifies that it has implemented the above robocall mitigation practices and relies on its upstream providers for STIR/SHAKEN authentication on SIP-based traffic wherever technically feasible.

7. Call Abuse Policy

SIP2020 has implemented a **Call Abuse Policy** and has published it on our website, incorporated it into our Terms of Use, and notified all customers.

Call Abuse Policy (Customer-Facing Language)

SIP2020 strictly prohibits the use of its services for any unlawful, fraudulent, abusive, or harmful calling practices. This includes but is not limited to:

- Initiating or transmitting illegal robocalls or spoofed caller ID information.
- Generating unwanted bulk calls, spam calls, or autodialed campaigns without prior consent of recipients.
- Violating federal or state laws, including the Telephone Consumer Protection Act (TCPA), Truth in Caller ID Act, or FCC regulations.
- Using SIP2020 services in a manner that negatively impacts our network, other customers, or the telecommunications ecosystem.

Enforcement

- Accounts found to be in violation of this Call Abuse Policy may be **suspended or permanently terminated without notice**.
- Violators may also be reported to regulatory authorities, enforcement agencies, and industry traceback groups.
- SIP2020 reserves the right to take any action necessary to protect its customers, network, and the public from illegal robocalls and abuse.

By using SIP2020 services, customers agree to comply fully with this Call Abuse Policy and acknowledge that failure to do so may result in service termination and legal consequences.

Traceback Request Single Point of Contact:

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