

Robocall Mitigation Program

3 Atlantic Systems

Ref: FCC / Robocall Mitigation Database

At present we do not have origination call services, only termination – we receive traffic to our toll free DID's for a single customer in Florida/USA and terminate at a nearshore call center. We are fully prepared to cooperate with authorities on tracing and blocking any robocalls that come to our network and have ensured our customer that we will comply with any requests to block IP addresses or phone numbers that originate from unwanted robocall traffic. The following is a list of protocols we have in place to ensure compliance and robocall mitigation:

1. Blocklists: Our end-user (call center) has a list of blacklisted numbers, dynamically updated by agents as they are detected to be spam / robocalls
2. Dynamic Traffic Analysis: At 3 Atlantic we audit our CDRs and traffic metrics on a daily basis, and upon detection of unusual traffic / cost increase activity we immediately contact both the customer and vendor (call center) to remediate and take action. This is our most effective tool, as both our vendors (Vitelity / ANPI and the call center) have independent audit tools and alert us as well when there is unusual traffic activity, and we have already had several instances of increased traffic / cost which have been remediated through this method, and helped us implement more effective protocols
3. Call screening: At the termination point, the call center's agents are constantly screening calls to avoid extra cost to our customer due to spam robocalls, based on patterns and their own database of callers / common origination points
4. Caller ID lookup: we are working with the call center to implement software that connects Caller ID information to blacklisted databases to increase the efficiency of the blocklists.
5. STIR/SHAKEN framework: we have recently been informed by our DID service provider (Vitelity Networks / ANPI) that we are covered by their STIR/SHAKEN protocol (quote: "As for STIR/SHAKEN call handling, Vitelity will sign your calls automatically, with an A-level attestation if outbound calls come from one of your Vitelity numbers, or C-level if they come from non-Vitelity numbers.") – we only have Vitelity numbers, and we only terminate calls.

Our protocols are in place 24/7/365, and we usually have response times of less than two hours for emergencies. We keep up to date with spam / robocall threat assessments and are particularly worried about the challenges presented by AI (Artificial Intelligence) assisted robocalls, which are hard to detect.

Respectfully,

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President And Owner