



Robocall Mitigation Plan – Protected Harbor

1. Company Information

- **Business Name:** Protected Harbor, Inc.
 - **Address:** 60 Dutch Hill Road
 - **Contact Person for Robocall Mitigation Issues:**
 - o Name: Jeff Futterman
 - o Title: Chief Operating Officer
 - o Email: jeff@protectedharbor.com
 - o Phone: 201-957-1602
 - **Parent, Subsidiaries, Affiliates:** None
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2. Role in the Call Chain

Protected Harbor is a **domestic voice service provider** offering hosted VoIP services to business clients. We originate calls on behalf of our customers and interconnect with upstream carriers for call termination.

3. STIR/SHAKEN Status

Protected Harbor does not directly implement STIR/SHAKEN authentication using its own SPC token or certificate.

The Company purchases SIP trunking and Direct Inward Dialing (DID) services from its upstream carrier, VoIP Innovations, which performs STIR/SHAKEN authentication where applicable.

Protected Harbor therefore certifies Partial STIR/SHAKEN implementation and maintains the robocall mitigation measures described in this plan for any traffic not authenticated under STIR/SHAKEN, in compliance with 47 CFR § 64.6305.

4. Robocall Mitigation Program

Protected Harbor maintains a comprehensive robocall mitigation program that includes the following elements:

4.1 Customer Vetting

Protected Harbor employs a multi-step **Know Your Customer (KYC)** process prior to onboarding any customer and throughout the customer lifecycle, which includes:

Identity Verification:

- Verification of the customer's legal business name, physical address, and corporate registration.
- Collection and validation of government-issued identification for authorized account signatories.
- Verification of tax identification numbers (EIN/SSN, as applicable).

Business Purpose Validation:



- Review of the customer's stated use case for outbound calling.
- Assessment of call types (e.g., customer service, transactional notifications, appointment reminders).
- Review of websites, marketing materials, and online presence where applicable.

Risk Assessment:

- Evaluation of customers against FCC guidance, industry best practices, and known robocall risk indicators.
- High-risk use cases (including telemarketing or high-volume outbound calling) are subject to enhanced scrutiny or rejection.

Ongoing Review:

- Existing customers are periodically re-evaluated, particularly when traffic patterns change or volumes increase materially.
- Failure to maintain accurate account information or demonstrate legitimate use may result in suspension or termination.

4.2 Ongoing Monitoring & Analytics

- All outbound call traffic is subject to monitoring for **high-risk patterns**, including short-duration calls, high-volume spikes, sequential dialing, or other indicators of illegal robocalling.
- Protected Harbor utilizes internal monitoring systems, including Wazuh for security logging and event monitoring, along with traffic pattern analysis to detect anomalous or high-risk outbound calling behavior.
- Suspicious accounts are subject to immediate investigation and may be suspended or terminated.

4.3 Upstream Provider Due Diligence

- Protected Harbor only partners with upstream carriers who are themselves listed in the FCC's **Robocall Mitigation Database**.
- We require upstream providers to maintain robocall mitigation programs and STIR/SHAKEN compliance.
- Periodic reviews are conducted to ensure upstream partners remain compliant.

4.4 Traceback Cooperation

- Protected Harbor cooperates fully with traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and commits to such requests **within 24 hours**.

5. Compliance History

Protected Harbor did not have a Robocall Mitigation Plan on file in the FCC Robocall Mitigation Database during **2025**. Following the FCC's adoption of the Robocall Mitigation Database requirements under **47 CFR § 64.6305**, the Commission issued follow-up communications requesting submission of the required plan. Due to an internal administrative oversight, Protected Harbor did not respond within the required timeframe and missed the applicable deadline.

As a result, the Enforcement Bureau removed Protected Harbor from the Robocall Mitigation Database pursuant to the In the Matter of Robocall Mitigation Database Filers, **Order, DA 25-737** (August 25, 2025). These Orders found that Protected Harbor had failed to timely file a required Robocall Mitigation Plan in the Robocall Mitigation Database as required by **47 CFR § 64.6305** and therefore was subject to removal until compliance was demonstrated.

Following removal, Protected Harbor immediately conducted an internal compliance review, developed and implemented a Robocall Mitigation Plan, and took corrective actions to align fully with the requirements of **47 CFR**



§ 64.6305 on August 26, 2025. The Company submitted its Robocall Mitigation Plan and related remediation materials to the FCC and filed an appeal seeking reinstatement in the Robocall Mitigation Database on August 26, 2025.

On August 29, 2025, the Enforcement Bureau provisionally reinstated Protected Harbor's Robocall Mitigation Database filing, noting that Commission staff may contact the Company to request additional changes or clarifications.

On November 19, 2025, the Enforcement Bureau identified deficiencies in the Company's filing and requested corrective updates. Protected Harbor promptly addressed the identified deficiencies and submitted this updated filing to the Bureau on February 3, 2026.

On March 3, 2026, the Enforcement Bureau identified deficiencies in the Company Filing and requested corrective updates. Upon review, we determined that our previous filing incorrectly indicated full STIR/SHAKEN implementation. Protected Harbor is not currently registered with the Secure Telephone Identity Policy Administrator (STI-PA) and does not yet have an Operating Company Number (OCN) or SPC token necessary to directly authenticate calls under STIR/SHAKEN.

To ensure that our filing accurately reflects our current operational status, we have updated our certification on March 5, 2026 to reflect **Partial STIR/SHAKEN implementation**, with our upstream carrier performing call authentication where applicable. Our robocall mitigation program remains in place in compliance with 47 CFR § 64.6305.

Protected Harbor has initiated the process to obtain the required registrations, including securing an OCN and registering with the STI-PA, with the goal of implementing full STIR/SHAKEN authentication through delegated signing with our upstream provider. Once these registrations and technical integrations are completed, we will update our RMD filing accordingly to reflect full STIR/SHAKEN implementation.

The matter was administrative and procedural in nature and did not involve allegations or findings of illegal robocalling, spoofing, or unlawful traffic origination. Protected Harbor has not been subject to any FCC enforcement action, monetary forfeiture, or law enforcement action related to illegal robocalling within the past two years.

6. Enforcement & Disciplinary Procedures

- Any customer found to be originating illegal robocalls will have service immediately suspended pending investigation.
- Confirmed violators will have contracts terminated and may be reported to law enforcement or industry partners.
- Internal compliance staff review mitigation program effectiveness at least annually.

7. Certification

Protected Harbor certifies that:

1. All calls originated on its network are subject to this robocall mitigation program.
2. This mitigation plan is filed in the **FCC Robocall Mitigation Database**.
3. Protected Harbor will update this plan if materially changed and remain in full compliance with **47 CFR § 64.6305**.