

As a small voice service provider, we are committed to protecting the integrity of the telecommunications network and ensuring that our services are not used for illegal robocalling activity. The following outlines our Robocall Mitigation Program, consistent with 47 CFR § 64.6305(a).

1. Reasonable Steps to Avoid Originating Illegal Robocalls:

- We only provide services to a small number of known, low-risk business clients.
- All clients are screened and vetted prior to activation to ensure they do not engage in robocall activity.
- We do not offer services to telemarketers, lead generators, or other high-risk entities.
- New clients must provide a valid business address, tax ID, and usage justification.
- All clients are US located, US owned, providing further validation of their use cases and ability to enforce our usage terms.

2. Network and Service Characteristics:

- Our network consists of a hosted PBX platform that does not support SIP-based STIR/SHAKEN call signing.
- All outbound calls are routed through our upstream provider, Bandwidth.com, which performs STIR/SHAKEN signing on our behalf.
- We do not operate as an intermediate or switching provider.
- We do not control SIP signaling or have the technical capability to sign calls directly.

3. Traceback Cooperation:

- We are fully committed to cooperating with all traceback requests from the FCC, law enforcement agencies, and the industry traceback consortium.
- Our designated point of contact monitors inquiries and will respond to traceback requests within 24 hours.
- We maintain call logs and metadata to facilitate traceback investigations.

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4. Monitoring and Enforcement:

- We monitor customer call patterns and traffic behavior to identify any unusual or potentially harmful calling practices.
- If a client is found to be originating suspicious or illegal traffic, service is immediately suspended and investigated.
- We maintain a zero-tolerance policy for violations of our robocall policy.

5. Documentation and Record-Keeping:

- We maintain records of customer vetting, traceback responses, and any enforcement actions taken.
- Records are retained for at least 12 months.

This program demonstrates our ongoing commitment to lawful voice traffic and compliance with federal robocall mitigation requirements.