

Robocall Mitigation Policy

Robocall Mitigation Compliance

Date	On behalf of	Change Summary
Dec 23, 2024	Bombshell Software LLC	Initial Version

Objective:	Establish and follow a policy that is compliant with applicable law
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I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Bombshell Software LLC, a small software consulting firm providing voice services to clients through a SaaS application platform.

II. General Prohibition Against Illegal Robocalling

Bombshell Software LLC end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

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- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Bombshell Software platform service to engage in or in connection with fraudulent activities

End users are notified that Bombshell Software may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

Bombshell Software utilizes the mitigation technique of “Know Your Customer.” Bombshell Software is a small provider that maintains a close relationship with its subscribers. Its customers are generally small business users and none of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling.

Bombshell Software has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

Bombshell Software has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions

IV. Network Monitoring

Bombshell Software is continuing development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.

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V. Traceback and Enforcement Cooperation

Bombshell Software will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Bombshell Software will dedicate sufficient resources to provide prompt and complete responses to traceback requests.