

Robocall Mitigation Plan for 86Borders as Upstream Service Provider

Risk Summary

86Borders is not a marketing firm. We do not have any robocall implementations and do not plan to implement any robocall functionality. [REDACTED]

[REDACTED] Robocalling is not part of the 86Borders business model or platform, and as such, users cannot originate robocalls.

Customers and employee users are limited in the number of concurrent calls they can place. Calls are only allowed to be made from a defined list of telephone numbers controlled by 86Borders. The 86Borders platform does not have any robocall functionality.

Know-Your-Customer

86Borders works closely with our customers (health plans and other covered entities under HIPAA) and verifies their legitimacy via contractual agreements. [REDACTED]

[REDACTED] The 86Borders operators are well-trained and monitored to ensure the highest call quality. Customers are configured within the system and limited by 86Borders personnel to using specified telephone numbers that are configured with [REDACTED] to ensure the numbers have SHAKEN/STIR A-level attestation.

Call Volume

[REDACTED] programmatically limits calls to 1 call per second. Human operators further limit the volume of calls. The system does not support robocalls.

Preventative Measures to Avoid Origination of Illegal Robocalls

The system is closed, requiring user authentication on a HITRUST R2 certified, HIPAA-compliant platform with appropriate defense-in-depth security protections in place to prevent a breach. The platform undergoes annual third-party penetration testing to ensure the security controls are effective.

The traffic is monitored, and any suspicious activity is investigated and addressed immediately.

The platform [REDACTED] which provides tools to monitor and secure the environment's network and hosts. These tools include, but are not limited to, web application firewalls, anti-malware scanning, intrusion detection and prevention, and vulnerability scanning. Access to the environment is restricted to authorized users utilizing the principle of least privilege.

[REDACTED] which provides tools for monitoring and ensuring all calls comply with SHAKEN/STIR requirements.

The user interface provides no means for any user to invoke batches of telephone calls.

Caller IDs

The telephone numbers that 86Borders utilizes have CNAM entries that correctly identify the numbers as 86BORDERS or by the customer's name as appropriate.

Traceback and Enforcement Cooperation

86Borders will respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

86Borders will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

Acceptable Use and Terms of Service Policies

Terms of Service: <https://86borders.com/terms>

Acceptable Use: <https://86borders.com/aup>