

Robocall Mitigation Plan for Softimum

1. Introduction

Softimum, LLC is a non-facilities-based Voice Service Provider reselling Hosted PBX services. We take a zero-tolerance approach to illegal robocalling and utilize the following procedures to prevent such traffic from originating on our platform.

2. Know Your Customer (KYC) Procedures

Before activating service, we vet every customer by:

- Verifying the business's legal identity via state filings or tax IDs.
- Confirming a valid physical U.S. address.
- Reviewing the intended use case (e.g., general office use vs. high-volume dialing).
- Requiring all customers to sign an Acceptable Use Policy (AUP) that strictly prohibits illegal robocalling and spoofing.

3. Call Analytics & Monitoring

We monitor our Call Detail Records (CDRs) for signs of suspicious activity, including:

- High volume of short-duration calls (under 6 seconds).
- Low call completion rates (high "Unanswered" or "Busy" counts).
- Rapid bursts of calls from a single source.

If suspicious activity is detected, we proactively reach out to the customer and will suspend service if the traffic is found to be non-compliant.

4. STIR/SHAKEN & Upstream Vetting

We utilize SkySwitch as our upstream provider. We ensure our upstream partners are compliant with FCC STIR/SHAKEN mandates. While we do not control the underlying network, we work with our provider to ensure calls are authenticated to the highest level possible.

5. Traceback Cooperation

Softimum commits to responding to all "Traceback" requests from the Industry Traceback Group (ITG) or the FCC within **24 hours**.³ We maintain internal logs to quickly identify the source of any flagged call.