

Entermark Distribution

ROBOCALL MITIGATION PLAN

Entermark Distribution is a Canadian Reseller and International Carrier licensed by the Canadian Radio-Television and Telecommunication Commission (CRTC). Entermark is based in Toronto, Canada with PRI and SIP connections to carriers in Canada, the USA and overseas. Entermark is primarily a voice Interexchange Carrier (IXC), connecting to and from Local Exchange Carriers (LEC's), International Carriers and other IXC's. Entermark also provides co-location for SIP, H.323 and ISDN voice and video conferencing companies.

Entermark's hybrid TDM and SIP network does not currently enable full STIR/SHAKEN except when SIP to SIP calls are only involved in the call. Entermark is slowly moving to an entire SIP network but the process is slow due to many legacy PRI connections and contracts as well as the need to support legacy ISDN audio and video conferencing services. During 2022 and 2023 all legacy SS7 connections were migrated to SIP.

Entermark does not provide any local telephone services. All of the telephone numbers used by Entermark are resold from other LEC's that are registered with the CRTC and/or the FCC for STIR/SHAKEN.

Entermark has "No STIR/SHAKEN Implementation" due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN.

TECHNICAL AND OPERATIONAL PLAN

- 1) Prevention** – Entermark is a small company with only a few direct connect customers that specialize in audio and video conferencing for business and the medical (telemedicine) industry. These customers are all co-located with Entermark making it very easy to monitor, detect and block illegal and/or inappropriate Robocall activity, however, these customers typically do not partake in Robocall activities as part of their normal business operation. Entermark's IXC business is dependent on working with the originating and terminating LEC's, International Carriers and other IXC's to block any illegal and /or inappropriate Robocall activity. All of these originating companies have Robocall Mitigation Plans filed with the FCC and/or the CRTC.
- 2) Detection** – Entermark has developed custom reporting systems that highlight Robocall activity. These reports enable technical staff to determine the source of the illegal and/or inappropriate Robocall activity and/or either block it or contact the origination party to notify them to block it. Also, these reports enable Entermark to locate and investigate Robocall activity that is reported by any terminating party and take appropriate mitigation activities as necessary.

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- 3) **Mitigation** – As mentioned in item 2) once illegal and/or inappropriate Robocall activity is detected, Entermark's technical staff determines the source of the Robocall activity then blocks it and/or contacts the origination party to notify them to block it. Some carriers try to mitigate Robocalls by surcharging excessive numbers of short duration calls. Entermark does not presently surcharge excessive short calls duration, however, if in the future excessive short duration calling is occurring that can be linked to illegal and/or inappropriate Robocall activity then Entermark may add an excessive short call duration surcharge. The biggest problem with Robocall mitigation is the increased use on burner telephone numbers and the spoofing of legitimate telemarketing telephone numbers. As soon as we detect and mitigate the problem Robocall numbers the Robocall activity stops and a new number appears.