

STIR/SHAKEN COMPLIANCE ATTACHEMENT McGuire & Associates, Inc. dba Emerald Telecom

As a switchless reseller of telecommunications services, Emerald Telecom does not have the ability to implement STIR/SHAKEN procedures.

Robocall Mitigation Strategy

Know Your Customer

Emerald Telecom is engaged with each customer they work with, and all customers are screened for appropriateness. Emerald Telecom screens CDR's regularly for suspicious behavior and call patterns that could relate to robocalling. Robocalling is in direct violation of Emerald Telecom terms of service and Emerald Telecom reserves the right to terminate service to any customer for violating those terms of service which includes unlawful robocalls.

Traceback

Emerald Telecom responds to all traceback and requests from law enforcement, the FCC, and the registered traceback consortium and will cooperate with those entities into investigating and stopping any bad actors that use the Emerald Telecom service to originate calls. Emerald Telecom will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

Stir/Shaken

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

Continuously monitoring outbound calling patterns and volume to confirm that no malicious activity is occurring.

All numbers are pass through carriers such as Bandwidth and Vitelity (an Inteliquent Company). These carriers have full STIR/SHAKEN deployments, as well as robocall mitigation programs and policies that will alert us if suspicious activity has been detected from our account. Caller IDS, DIDs, and CNAMEs are verified with the customer to prevent any spoofing behavior. Our system will inform us if a call has originated with an invalid or unallocated DID, where we will investigate to determine if the call was legitimate, and if not, we will warn and stop the customers service as appropriate