



Robocall Mitigation Plan

Updated April 2024

Babcock Enterprises L.L.C. dba Straight Shot Wireless

Introduction:

This Robocall Mitigation Plan outlines the measures implemented by Straight Shot Wireless to prevent the origination, transmission, and processing of unlawful robocalls through our network. Our plan complies with the requirements set forth by the Federal Communications Commission (FCC) as detailed in the Sixth Caller ID Authentication Report and Order.

Certification:

Straight Shot Wireless certifies that:

All calls originating from our network are subjected to rigorous robocall mitigation practices.

We have not been prohibited from filing in the Robocall Mitigation Database.

We have fully implemented STIR/SHAKEN protocols on all IP portions of our network.

Traceback Cooperation:

Straight Shot Wireless fully cooperates with traceback requests from the FCC, law enforcement, and industry traceback consortiums. We commit to providing comprehensive responses within 24 hours of receiving a request, barring weekends and federal holidays.

Mitigation Techniques:

1. **Trans Nexus Integration:** All outbound calls, except exempt services like 911, are routed through Trans Nexus for fraud detection and call signing. Only calls passing the fraud detection screening are forwarded.
2. **Vetting Practices:** We conduct in-depth vetting of all VOIP customers through face-to-face interactions, ensuring legitimacy and compliance. This includes collecting detailed information such as business location, contact persons, and federal Tax ID.
3. **Call Analytics:** We employ third-party services to analyze call patterns and identify potential fraudulent activities. This system alerts us to suspicious calling patterns, enabling prompt investigation and mitigation actions.
4. **Contractual Measures:** Our contracts with end-users and upstream providers include clauses specifically designed to mitigate the risk of illegal robocalls. These contracts obligate partners to adhere to legal standards and allow for immediate termination of service if they are found in violation.

Provider Identification and Contact Information:

- **Business Name:** Babcock Enterprises L.L.C. dba Straight Shot Wireless
- **Address:** 804 N Union Ave, Roswell, NM 88201
- **Contact Person:** Nathan Babcock
- **Phone:** 575-208-7915
- **Email:** support@sswireless.net

Additional Information Provided on Submission Form:

- **Roles in Call Chain:** Voice Service Provider serving end-users.
- **Compliance with Know-Your-Upstream Provider Requirements:** Our engagement with upstream providers is governed by strict compliance checks and contractual agreements ensuring accountability and traceability.
- **Disclosure of Affiliates and Subsidiaries:** Includes Trans Nexus as a partner in our robocall mitigation efforts.

Compliance Obligations:

We comply with all FCC regulations and are committed to continuous improvement of our mitigation practices. Our plan is reviewed and updated bi-annually to incorporate advances in technology and changes in robocall patterns.

Submission and Confidentiality:

This plan will be submitted in PDF format via the FCC's Robocall Mitigation Database portal. We request that certain proprietary information contained within this document be treated as confidential in accordance with FCC regulations.