

JMF Solutions, Inc

Robocall Mitigation Plan

Section 1: Company Info

Company Name: JMF Solutions, Inc
FCC Reg Num: 0019000462
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JMF Solutions, Inc operates as a VoIP reseller providing services to downstream businesses and end users. While we rely on upstream carriers for call termination, we originate calls on behalf of our customers.

We certify that JMF Solutions has implemented a Robocall Mitigation Plan and takes active measures to ensure compliance with the FCC's requirements to prevent the origination of illegal robocalls.

Section 2: Robocall Mitigation Practices

Customer vetting:

We implement a rigorous **Know-Your-Customer (KYC)** process for all new customers to verify their legitimacy. This includes:

- Legal business name and verification of business registration.
- Physical business address and confirmation of operations.
- Description of the nature of their business, intended use of VoIP services, and expected call volumes.
- Contact information for an authorized business representative.

- Contracts with customers include strict terms prohibiting illegal robocalling activities, with provisions for immediate termination in case of non-compliance.

- For renewing customers, periodic reviews are conducted to confirm continued compliance with these terms.

Blocking Suspicious Traffic:

- We maintain the capability to block traffic identified as illegal based on internal and upstream carrier analytics.
- Illegal traffic is immediately reported to our upstream carriers and, where necessary, to regulatory authorities.

Use of Call Analytics Tools:

- We leverage third-party call analytics systems to enhance traffic monitoring.
- Third-party vendors include VoIPMonitor (provides real-time analytics for anomaly detection) and Kamilio (enables advanced routing and filtering to block suspicious calls)

Collaboration with Upstream Carriers:

- Strong partnerships with upstream carriers ensure additional layers of traffic review and flagging of suspicious activity.
- We comply with traceback requests from the Industry Traceback Group (ITG) and regulatory authorities in a timely manner.

STIR/SHAKEN Implementation

1. We have fully implemented STIR/SHAKEN across all IP portions of our network, ensuring that all calls originating from our network are authenticated in compliance with the STIR/SHAKEN framework.
2. All calls are transmitted to authenticated carriers certified under the STIR/SHAKEN framework.
3. Unauthenticated calls are flagged and handled appropriately to prevent illegal robocalling activity.

Reporting and Enforcement

1. All illegal robocalling activity is promptly reported to upstream carriers, law enforcement, and relevant regulatory bodies.
2. Violations of our terms of service are escalated to our engineering team, which reviews the evidence and determines appropriate action.
3. Customers found to violate our terms of service face immediate suspension and, if necessary, permanent termination of service.

Section 3: Certification Statement

I certify that the above statements are accurate and complete to the best of my knowledge. I understand that any false statements may subject JMF Solutions to enforcement action by the FCC.

Signature:

Caleb Brown

VoIP Engineer

December 19, 2024