

Jazzcomm Systems, Inc.
1115 Broadway
Floor 12
New York, NY 10010
646-494-0300 // legal@jazzcomm.io

30 December 2024

Re: Robocall Mitigation Program

First, Jazzcomm appreciates and compliments the pioneers and the FCC for establishing new programs to reduce the excessive amount of unwanted robocalls within our communications infrastructure. These programs are critical to maintaining trust in our communications, effectiveness of our time, and individual sovereignty.

Second, we have implemented or are implementing various strategies to reduce the origination of these unwanted calls from our network, included but not limited to:

- Call patterns that violate our Terms of Service or contract violations
- Call patterns that indicate abnormal or low call completion rates
- Detection of calls with origination numbers that have invalid, unallocated, unassigned, or have Do Not Originate entries
- Reputation lookup of the businesses that we provide service
- Maintaining strong relationships with our upstream carriers and partners to help identify non-compliant traffic
- During the evaluation if STIR/SHAKEN can be implemented on our network, and since we are a small retail-only service provider at this time, we determined that the scope of risk is small and that our method of relying more heavily on our Know Your Customer evaluations is reasonable for the size and scope of risk and rely on our upstream carriers to attest STIR/SHAKEN on our behalf
- Therefore, pursuant to 47 CFR § 64.1200(n)(4), have implemented know your customers procedures by evaluating new customers for their intended purpose, and comparing that against their traffic patterns at periodic intervals after they begin service, and periodically evaluating existing customers for abnormal usage of the same
- Preventing customers from reselling our services to other non-compliant and/or illegal third parties

The methods Jazzcomm employs may change from time to time as mitigation, prevention, and detection strategies further develop.

Thank you for helping to keep our telecommunications systems a safe, neutral and trusted place to communicate.

Sincerely,

Jazzcomm Systems