

Robocall Mitigation Plan – ES | Consulting, Inc.

Company Information

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Certification Type

Full STIR/SHAKEN Implementation

STIR/SHAKEN Deployment

ES | Consulting has deployed the STIR/SHAKEN authentication framework on all IP-based outbound calls where technically supported. All traffic is delivered through our upstream provider which performs STIR/SHAKEN call signing on our behalf. Our upstream provider has provided assurances that it maintains full compliance with FCC robocall mitigation rules, cooperates in industry traceback efforts, and applies authenticated call-signing in accordance with STIR/SHAKEN standards. ES | Consulting and provider work together to ensure illegal robocalls are detected and stopped. Because ES | Consulting operates as a reseller of upstream voice services, we rely on our provider for analytics-based call blocking, call authentication, and fraud detection capabilities.

Robocall Mitigation Practices

Customer Vetting (KYC)

Before activating service, ES | Consulting applies a structured Know-Your-Customer process:

- Verification of business identity, registration, and responsible parties.
- Review of the customer's intended use case and calling patterns.
- Validation of any telephone numbers the customer intends to use.
- Rejection of customers providing inconsistent, incomplete, or anonymous information.
- Refusal to activate customers associated with known fraud or prior involvement in unlawful robocalling.
- Customers must accept contractual terms that explicitly prohibit illegal robocalling and unauthorized caller ID spoofing.

Continuous Traffic Monitoring

Traffic monitoring is performed through automated protections and analytics provided by our upstream provider. They continuously evaluate traffic to identify:

- Abnormal call bursts
- Short-duration patterns
- Sequential dialing patterns
- Invalid, unassigned, or suspicious caller ID usage

Enforcement and Response Procedures

If suspicious traffic is detected:

- We immediately investigate the customer's activity.
- Outbound calling may be suspended during the investigation.
- Customers confirmed to engage in illegal robocalling are terminated.
- We respond to all traceback requests from the Industry Traceback Group, FCC, or law enforcement **within 24 hours**.

Caller ID and Telephone Number Controls

ES | Consulting only allows customers to present Caller ID numbers that:

- Are assigned by ES | Consulting,
- Are provisioned by our upstream provider, or
- Have been validated as legitimately owned or controlled by the customer.

Our systems and our upstream provider block or downgrade calls where the originating caller ID does not match authorized telephone numbers assigned to that customer.

International Calling

ES | Consulting does not provide international originating voice services at this time.

If this changes, we will implement appropriate customer vetting, number validation, and upstream verification before enabling international traffic.

Call Analytics

Our upstream provider performs all analytics-based detection and blocking of suspicious or unlawful call patterns. Their systems apply FCC-compliant analytics to identify and mitigate potential robocall traffic.

ES | Consulting supplements this by verifying that customers only originate calls from known locations and authorized DIDs/TNs.

Reseller Status

ES | Consulting operates as a reseller of voice services.

Because some authentication and mitigation measures are performed upstream, we maintain continuous coordination with upstream provider to ensure that all STIR/SHAKEN, traceback, and mitigation responsibilities are fully met.

Ongoing Program Review

ES | Consulting regularly reviews and updates its robocall mitigation practices to remain aligned with new FCC rules, industry best practices, and emerging trends in fraudulent calling.

Statement of Compliance

ES | Consulting is committed to preventing illegal robocalls and maintaining full compliance with the FCC's rules, including STIR/SHAKEN deployment, customer vetting, traffic monitoring, traceback cooperation, and enforcement.

Dennis G. Fox II

President / CEO

ES | Consulting, Inc.