

Robocall Mitigate Policy

Objective: Establish and follow a policy that is compliant with TRACED Act.

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Pinnacle IP Solutions (IPS).

Pinnacle IPS end user services are subject to restrictions contained in its legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service requirements.

Existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- Using any autodialing services
- Providing altered or false information about the identity of the sender or the origin of a phone call
- Violating any applicable local, state, or federal law; using the Pinnacle IPS service to engage in fraudulent activities.

Pinnacle IPS end users are notified that Pinnacle IPS may act up to suspension or termination of service for violation of the TOS.

Pinnacle IPS utilizes the mitigation technique of “Know Your Customer.” Pinnacle IPS provides voice services for mainly K-12 school systems or small to medium size businesses. Pinnacle IPS provides no residential service, currently.

Pinnacle IPS screens all new customers requesting service:

- Our customers are K-12 school systems or small to medium size businesses in our local service territory.
- We meet face to face with each customer to confirm the number of voice lines being requested is in line with the size of the business.
- We manage the phone system for all our voice service customers. This includes setting the caller ID for each extension. Limited access is provided to customers to reduce the chance of spoofing caller ID.
- We do not service large commercial customers or VoIP wholesale customers.

Pinnacle IPS will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group to investigate and stop illegal robocalls. Pinnacle IPS will dedicate sufficient resources to provide prompt and complete responses to traceback requests.