

Declaration:

All services originating on our network traverse through upstream providers that implement STIR/SHAKEN authentication where applicable. As we are in a migration phase, STIR/SHAKEN is implemented on a portion of our network, with authenticated signing provided by upstream partners, including SkySwitch and Bandwidth, as appropriate.

All services are monitored for unusual or suspicious call volumes, and mitigation actions are applied as needed to prevent illegal robocall activity.

Access to services is secured either by restricting internet exposure or by using strong passwords combined with brute-force detection and mitigation controls.

We take reasonable steps to prevent illegal robocalls and do not knowingly permit spam or robocalling activity. Call volumes are restricted and tailored based on each customer's size, use case, and industry.

For the extensions under 47 CFR § 64.6304, we qualify as a small service provider under subsection (a), managing fewer than 100,000 subscriber lines.