

Robocall Mitigation Program Description

Provider Information

New Era Technology Voice Service Provider without STIR/SHAKEN Implementation

1. Network Configuration and Call Flow

- Utilization of certified third-party providers:
 - Voice calls: Kazoo platform
 - Messaging: Twilio and Bandwidth
- All voice traffic originates through authorized carriers with STIR/SHAKEN implementation

2. Mitigation Practices

2.1 Know Your Customer (KYC) Procedures

- Government-issued ID verification for all customers
- Business verification through corporate documentation
- Regular account reviews and validation
- Documented customer onboarding process

2.2 Network Monitoring and Analytics

- Real-time traffic pattern analysis
- Automated detection of suspicious calling patterns
- Volume monitoring and limitations
- Integration with upstream providers' fraud detection

2.3 Technical Controls

- Strict rate limiting on outbound calls
- Call authentication through upstream provider implementation
- Regular traffic analysis and reporting
- Account-level restrictions and monitoring

3. Traceback Procedures

3.1 24-Hour Response Protocol

- Dedicated team for handling traceback requests
- 24/7 contact availability
- Documented procedures for preserving evidence
- Cooperation with upstream providers for investigations

3.2 Industry Collaboration

- Active participation in USTelecom Traceback Group initiatives
- Coordination with upstream carriers
- Compliance with industry best practices
- Regular updates to procedures based on industry standards

4. Compliance Documentation

4.1 Record Keeping

- Detailed call records retention
- Customer verification documentation
- Incident response logs
- Regular compliance audits

4.2 Staff Training

- Regular compliance training
- Documented procedures
- Incident response drills
- Industry updates and continuing education

5. Implementation Timeline

- Continuous monitoring and updates
- Quarterly review of procedures
- Annual program assessment
- Regular staff training updates

Contact Information

Traceback Coordinator: Namit Joshi Email: namit@sendhub.com Phone: 8447363482 Address: 4695 Chabot Dr, Suite 101, Pleasanton, CA-94588

Certification Statement

I certify that this robocall mitigation program is effective in preventing origination of illegal robocalls and complies with 47 CFR § 64.6305.