

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
4-23-2024	IVSComm Inc.	3rd Version

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

I. Overview

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 to 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 IVSComm Inc., a provider of competitive local VoIP services. IVSComm Inc. serves primarily Michigan based small businesses with some out of state customers as well.

IVSComm Inc. has partnered with a trusted provider to implement STIR/SHAKEN in parts of its network as it is realistically able to do so and is in the process of decommissioning portions of its network that are not yet compliant.

II. General Prohibition Against Illegal Robocalling

IVSComm Inc. end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

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

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the IVSComm Inc. service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS. IVSComm Inc.'s end users are notified that IVSComm Inc. may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

IVSComm Inc. utilizes the mitigation technique of “Know Your Customer.” IVSComm Inc. is a small long established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

IVSComm Inc. has set a call path limit per server based on its peak normal customer usage. The level – referred to as “large volume calling capability” – is subject to change.

IVSComm Inc. has a screening for new customers requesting service at or above large volume calling capability levels:

- We verify addresses to look for overlapping / multiple deployed voice path subscriptions(to the best of our ability)
- An IVSComm Inc. representative or verified reseller visits the premise of each business we serve to verify the number of users at the location is appropriate for the volume of calling

IV. Network Monitoring

IVSComm Inc. is in development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling.

V. Traceback and Enforcement Cooperation

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