

Enterprise Network Systems, Inc. Robocall Mitigation Program Description

Program Overview: Our Robocall Mitigation Program is designed to ensure compliance with the Federal Communications Commission (FCC) regulations outlined in 47 CFR § 64.6301(a)(1) and (2). The program aims to authenticate and verify caller identification information for all calls originating on our network, thereby reducing the prevalence of illegal robocalls.

Key Components:

1. Caller ID Authentication:

- We fully implement the STIR/SHAKEN authentication framework across our entire network.
 - 1. All call traffic is handled by our upstream provider, Vitelity. Vitelity then provides the Stir/Shaken authentication for all calls.
 - 1. Vitelity - ANPI Business, LLC
PO Box 7411017
Chicago, IL 60674-1017
Phone: 888.89.VITEL (84835) - Fax: 1.877.662.8928
- All SIP (Session Initiation Protocol) calls that transit our network are authenticated and verified for caller identification information.
- Caller ID information for all SIP calls originating from our network and exchanged with other voice service providers or intermediate providers is authenticated and transmitted with verified caller identification information.

2. Avoidance of Illegal Robocall Traffic:

- Our program includes reasonable steps to avoid originating illegal robocall traffic.
 - 1. We directly handle the provisioning of all extensions, phone and device connections and outbound caller ID settings for each extension. End users are not able to override these settings. This means that for every outbound call, the caller ID is set at the system level, which is then passed to the Stir/Shaken platform for authentication.
- We continuously monitor and analyze call patterns to identify and block potential illegal robocall sources.
 - 1. We monitor the outbound call volume and traffic patterns monthly related to our metered usage billing. These metered usage amounts are compared against normal usage patterns for each customer. In this way any deviations can be identified that might indicate some sort of hacking by a potential robocaller.
- We maintain a small list of small business customers that we provide voice services to. These are longstanding customers that we have other business service relationships with as well. In this way we hope to limit any potential for robocalls.

3. Traceback and Cooperation:

- We commit to responding within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium.
- We cooperate fully with these entities in investigating and stopping any illegal robocallers that use our service to originate calls.

4. Certification and Compliance:

- We certify that all calls originating on our network are subject to this robocall mitigation program.
- We ensure that our certification is up-to-date and has not been removed by FCC action.