

Robocall Mitigation Plan – Convergentworks, LLC (RMD0007918)

Company Overview

Convergentworks, LLC is a small VoIP PBX service provider serving fewer than 50 enduser customers. We provide VoIP services that originate calls onto the public switched telephone network (PSTN). As a voice service provider, we are subject to the FCC's STIR/SHAKEN implementation obligation and related robocall mitigation requirements.

STIR/SHAKEN Implementation and Exemption Justification

Convergentworks, LLC has implemented STIR/SHAKEN on a partial basis. We do not have facilities-based interconnection to the PSTN. Instead, we rely on upstream carrier partners for call origination and termination. These upstream carriers apply STIR/SHAKEN call authentication where technically feasible.

Because we do not directly control all call authentication functions, not every call can be fully signed end-to-end within our own network. Therefore, in accordance with 47 CFR § 64.6301(a)(2) and (3), Convergentworks, LLC certifies under the Partial STIR/SHAKEN Implementation category. Pursuant to 47 CFR § 64.6305(a), we maintain a robocall mitigation program to address any calls not signed with STIR/SHAKEN.

Coordination with Upstream Carriers

We work closely with our upstream carriers to ensure that STIR/SHAKEN authentication is applied to traffic transiting their networks, and that any robocallrelated issues are promptly addressed.

Commitment to Compliance

Convergentworks, LLC is committed to complying with the FCC's robocall mitigation rules and to preventing the origination of unlawful robocalls on our network. We will continue to evaluate and update our mitigation practices to align with FCC requirements and industry best practices.

Know Your Customer (KYC) and Robocall Mitigation Procedures

Convergentworks, LLC maintains a Know Your Customer (KYC) and robocall mitigation program designed to prevent the origination of unlawful or abusive robocall traffic on its network.

Customer Vetting and Onboarding

Convergentworks, LLC limits service to a small number of established business customers and does not provide service to anonymous users, lead generators, mass-dialing customers, or resellers. Prior to activating service, Convergentworks, LLC performs customer vetting that includes:

- Verification of the customer's legal business name, physical address, and contact information.
- Confirmation of the customer's ownership or control of the calling numbers used on the network.
- Review of the customer's intended calling use case to confirm that call activity is consistent with lawful business communications.

- Contractual prohibitions against the use of the network for illegal robocalls, spoofing, or other fraudulent activity.

Customers that cannot satisfactorily demonstrate a legitimate use case are not onboarded.

Traffic Monitoring and Analytics

Convergentworks, LLC monitors outbound call traffic on an ongoing basis to identify potential indicators of illegal or abusive robocalling, including but not limited to:

- Unusually high call volumes.
- Short-duration or high-frequency calling patterns.
- Sudden spikes in traffic inconsistent with the customer's historical usage.
- Complaints or notifications received from upstream carriers or other industry participants.

Convergentworks, LLC **does not currently use a third-party analytics vendor** for robocall detection. Traffic monitoring is performed using call detail records (CDRs), usage reports, and alerts provided by its upstream carrier partners and internal review processes.

Investigation and Enforcement

If suspicious activity is identified, Convergentworks, LLC promptly investigates the traffic and may take one or more of the following actions:

- Contact the customer to request clarification or corrective action.
- Temporarily suspend call origination privileges.
- Permanently terminate service for customers engaged in prohibited activity.

Convergentworks, LLC cooperates with its upstream carriers and relevant authorities as appropriate to address confirmed or suspected robocall violations.