

Robocall Mitigation Plan

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Shared Comm IT offers voice service to a select number of clients (16). Shared Comm IT works with clients to ensure that there is not an access number of lines available to the client with a total number of lines totaling less than 1000. Due to the client base and having less than 1000 lines Shared Comm IT is eligible for the STIR/SHAKEN implementation extension following 47 CFR 64.6304. Shared Comm IT partners with **inteliquent a sinch company** for all SIP originations.

Shared Comm IT follows the FCC Robocall Mitigation Plan criteria.

Know Your Upstream Providers:

Shared Comm IT exclusively originates all SIP trunk usage with **inteliquent a sinch company**. Having **inteliquent a sinch company** supports any issues associated with robocall usage and their own mitigation plan.

Know Your Customer:

All client phone systems are partially managed by Shared Comm IT. We exclusively partner with businesses that provide healthcare or business services. Our clients do not use telemarketing services. We ensure every phone number that is ported for our client usage is being utilized for their standard business practices.

Traceback:

Shared Comm IT will provide any Traceback requests within 24 hours from the FCC, law enforcement, or any other entities to ensure that our telephone numbers are not being used to make illegal robocalls.

Internal Robocall Mitigation Steps:

- Customers do not have access to alter their caller ID except for other numbers that are owned by the customer.
- Simultaneous calls are limited to the customer so there can not be a mass outgoing call list.
- SIP service is controlled by Shared Comm IT and none of our customers. If there are change requests, they must open a ticket.
- The phone system is restrictive in who may access the usage of numbers to ensure no outside entities get use of customer numbers.
- All calls are logged in the phone system and by our upstream provider **inteliquent a sinch company**.
- Shared Comm IT runs monthly call reports to ensure our customers are not making mass robocalls.