

## **Robocall Mitigation Measures**

In the absence of STIR/SHAKEN, we have implemented a robust robocall mitigation program designed to identify, monitor, and prevent illegal robocalls within our network. The measures include:

### **3.1. Traffic Monitoring and Analysis**

- Continuous monitoring of voice traffic to detect patterns indicative of illegal robocalling.
- Analysis of call volume and destination patterns to identify anomalies.

### **3.2. Call Blocking Policies**

- Implementation of call-blocking technology to prevent high-risk traffic from terminating on our network.
- Regular updates to blocking criteria based on industry best practices and FCC guidance.

### **3.3. Customer Screening and Verification**

- Strict vetting of new customers to ensure they are legitimate users of our services.
- Ongoing monitoring of customer behavior to detect potential misuse.

### **3.4. Collaboration with Other Providers**

- Coordination with upstream and downstream carriers to address suspected spoofing and mitigate its impact.
- Sharing of data and best practices with industry peers to improve detection capabilities.

### **3.5. Consumer Protection Measures**

- Establishing a hotline for consumers to report suspected robocalls.
- Educating consumers on recognizing and avoiding robocalls.

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## **4. Future Compliance Plans**

While we are currently unable to implement STIR/SHAKEN, we are actively working toward compliance by:

- Exploring partnerships with third-party vendors to facilitate the transition to IP-based systems.
- Allocating resources for infrastructure upgrades, including transitioning to VoIP technology.
- Developing a phased implementation plan for STIR/SHAKEN with milestones to track progress.

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**5. Conclusion** This robocall mitigation program demonstrates our commitment to preventing illegal robocalls and protecting consumers from fraudulent activities. As our technological capabilities evolve, we will continue to enhance our mitigation efforts and work toward full STIR/SHAKEN compliance.

**Certification:** We certify that this robocall mitigation program has been implemented and is actively enforced, as required by the FCC's rules and guidelines.