



Luma Health
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Luma Health - Robocall Mitigation Policy

Pursuant to 47 CFR § 64.6305, all voice service providers must file certifications to the Federal Communications Commission's Robocall Mitigation Database providing detailed information regarding their implementation of the STIR/SHAKEN caller ID authentication framework and/or a robocall mitigation program. Luma Health has implemented a Robocall Mitigation Program detailed within this document.

I. STIR-SHAKEN IMPLEMENTATION STATUS

The Provider has implemented the STIR/SHAKEN framework. All customers have individual STIR/SHAKEN registrations which are used for outbound calls. These registrations are created as part of the onboarding process for new customers.

II. TRACEBACK REQUESTS

As noted above, the Provider will cooperate with the FCC, law enforcement and the ITG on all traceback requests and investigations. The Provider has implemented full auditability of all messaging sent through its platform, and has additional auditability through its messaging vendors.

This auditability allows the provider to commit to fully responding to any traceback 2 request received within 24 hours after receiving the same. Requests for tracebacks can be submitted to the contact information submitted in the Provider's Robocall Mitigation filing.

III. CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, the Provider uses best practices in vetting the identity of all of its voice service subscribers. All customers are health systems which undergo an extensive vetting process before signing Providers Master Service's Agreement (MSA). As part of this vetting process the Provider confirms the identity of customers using its messaging services through collecting information such as physical customer location, contact person(s), state or country of incorporation, and federal tax ID. As part of MSA, Provider requires health systems gather patient consent (opt in) for messaging before contacting a patient, this consent is usually gathered in person at physical practice locations, however may also be collected online. Patients may have longstanding consent established with their health system before the health system engages with the provider.



The Provider's MSA defines acceptable use policies as a means of preventing its new and existing subscribers from using their voice services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of Provider provided services include terms indicating specifically to all customers that their services should not be used for the purpose of engaging in illegal messaging, and the Provider reserves authority within its service agreements to suspend or terminate a subscriber's voice service for violating applicable service-related terms.

IV. TELEPHONE NUMBER VALIDATION PRACTICES

The Provider owns most telephone numbers used with its voice services and registers each number for the use of a single specific customer in accordance with its STIR/SHAKEN implementation. If the customer requests the use of a number not owned by the Provider, the customer must prove ownership of the number using either billing statements for proof of ownership or manual verification of ownership of the number, all verification of phone number ownership is done in accordance and conjunction with the Providers messaging vendors.

V. INTERNATIONAL CALL ORIGINATORS

The Provider does not currently participate in international calling.

VII. ONGOING ROBOCALL MITIGATION PRACTICES

The Provider routinely monitors the usage and quality of all outbound calls running through its network, and has alerting for any abnormalities in volume, or DNC requests, which may indicate use of the network for originating illegal robocalls. If the Provider identifies activity consistent with illegal robocalls the customer will be contacted within twenty-four hours for further investigation and the customers messaging may be temporarily paused until corrective measures are put in place.