

Robocall Mitigation Program Description

NuTech Services, LLC

Submitted to the Federal Communications Commission

Robocall Mitigation Database

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Introduction

NuTech Services, LLC ("NuTech") is committed to combating illegal robocalls and ensuring compliance with the Federal Communications Commission's (FCC) regulations. As a voice service provider, NuTech acknowledges its responsibility to prevent the origination of illegal robocall traffic on its network. This Robocall Mitigation Program (RMP) description outlines the reasonable steps NuTech takes to mitigate illegal robocalls, in accordance with 47 CFR § 64.6305 and FCC guidelines. NuTech partners with Flowroute, a certified provider, to handle all call traffic and implement the STIR/SHAKEN caller ID authentication framework, as well as Flowroute's proprietary fraud prevention features, relieving NuTech of the need to develop its own STIR/SHAKEN technology or fraud detection systems.

Roles in the Call Chain

NuTech Services, LLC operates as a voice service provider, originating voice traffic within the United States using North American Numbering Plan (NANP) resources. All call traffic is handled by Flowroute, a certified provider responsible for call routing, STIR/SHAKEN implementation, and fraud prevention. NuTech does not operate IP-based network infrastructure, nor does it act as a gateway provider or non-gateway intermediate provider. NuTech collaborates with Flowroute and other downstream providers to ensure compliance with FCC robocall mitigation requirements.

STIR/SHAKEN Implementation

NuTech Services, LLC relies on Flowroute, a certified STIR/SHAKEN provider, to handle all call traffic and implement the STIR/SHAKEN caller ID authentication framework. Flowroute's infrastructure ensures that calls originated by NuTech are authenticated in compliance with FCC requirements. Specifically:

- Flowroute digitally validates the handoff of phone calls, ensuring accurate caller ID information is transmitted to combat robocalls and spoofed calls.
- Flowroute assigns appropriate attestation levels (A, B, or C) based on the call's origin and NuTech's knowledge of the calling party.
- For non-IP portions of the network, NuTech relies on Flowroute to implement alternative caller ID authentication solutions or mitigation measures to prevent illegal robocalls.

As NuTech does not operate IP-based network infrastructure, it depends entirely on Flowroute for STIR/SHAKEN compliance and does not maintain its own STIR/SHAKEN certification.

Robocall Mitigation Program

NuTech Services, LLC has established a comprehensive robocall mitigation program to prevent the origination of illegal robocall traffic, leveraging Flowroute's proprietary fraud prevention features. The program includes the following reasonable steps:

Affirmative Measures to Prevent Illegal Robocalls

Know-Your-Customer (KYC) Procedures: NuTech implements a robust KYC policy to verify the identity and intent of new and renewing customers. This includes collecting and validating business information, such as company name, address, and tax identification number, to ensure customers are legitimate entities and not likely to originate illegal robocalls.

- **Contractual Provisions:** NuTech includes specific clauses in its service agreements with customers and Flowroute, prohibiting the use of its services for illegal robocall activities. These clauses require customers to comply with FCC regulations and allow NuTech to suspend or terminate services for non-compliance.
- **Coordination with Flowroute's Fraud Prevention:** NuTech relies on Flowroute's proprietary fraud prevention features to monitor and mitigate illegal robocall activity. These features include:
- **Behavioral Monitoring:** Flowroute's system automatically monitors call patterns and flags unusual or suspicious activity, such as sudden spikes in traffic to unfamiliar destinations, enabling proactive identification of potential robocall campaigns.

- **Account-Level Restrictions:** NuTech customers can set controls via Flowroute's online portal, including maximum outbound call rates, destination whitelists to restrict calls to pre-approved numbers, and IP-based authentication to allow calls only from specific, authorized IP addresses.
- **Account Suspension Protocols:** In cases of unusual activity, Flowroute's team automatically and temporarily disables an account to mitigate financial risk and works with NuTech and the customer to resolve potential vulnerabilities.

Call Analytics and Fraud Prevention

NuTech collaborates with Flowroute, which employs proprietary in-house fraud prevention systems to identify and block illegal robocall traffic. Flowroute's system:

- Analyzes call patterns and metadata to detect anomalies associated with illegal robocalls, such as high call frequency or invalid caller ID information.
- Automatically blocks calls identified as fraudulent or likely to be illegal based on real-time behavioral analysis.
- Provides detailed reporting to NuTech for ongoing monitoring and compliance verification.

NuTech relies on Flowroute's robust fraud prevention capabilities to ensure proactive and effective mitigation of illegal robocall traffic.

Traceback Cooperation

NuTech is committed to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group within 24 hours. The company has designated a point of contact, as detailed below, to handle traceback requests and cooperate fully with investigations into illegal robocallers. NuTech maintains detailed records of customer agreements and coordinates with Flowroute to facilitate rapid response and assist in identifying and stopping illegal robocall campaigns.

Know-Your-Upstream-Provider Procedures

NuTech conducts due diligence on its upstream provider, Flowroute, to ensure compliance with FCC robocall mitigation requirements. This includes:

- Verifying that Flowroute is registered in the FCC's Robocall Mitigation Database.
- Reviewing Flowroute's robocall mitigation plan to confirm it includes reasonable steps to prevent illegal robocalls.

- Including contractual provisions requiring Flowroute to comply with FCC regulations and cooperate with traceback efforts.

Additional Information

- Business Information: NuTech Services, LLC operates under its legal name and has no other business names or previously used names. NuTech is not a foreign voice service provider.
- Regulatory History: NuTech Services, LLC, and its affiliates, subsidiaries, or parent companies have not been subject to any formal FCC, law enforcement, or regulatory agency action or investigation related to illegal robocalls, spoofing, or deficient Robocall Mitigation Database filings in the past two years.
- Contact Information: For robocall mitigation-related issues, NuTech designates:
 - Name: Fred Rappuhn
 - Title: President
 - Business Address: 11426 Davis Street Suite 204, Grand Blanc, Michigan, 48480
 - Telephone: (810) 230-9455
 - Email: support@nutechology.com

Certification

NuTech Services, LLC certifies, under penalty of perjury, that the information provided in this Robocall Mitigation Program description is true and correct. NuTech is committed to maintaining compliance with FCC regulations and continuously improving its robocall mitigation efforts to protect consumers from illegal robocalls.

Fred Rappuhn

President

NuTech Services, LLC