

Signal4, LLC. Robocall Mitigation Program

This Robocall Mitigation Plan describes the specific reasonable steps that Signal4, LLC. has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Signal4, LLC. has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Signal4, LLC.’s business customers are all small businesses that are physically located within our service territory. Prior to a new business customer ever making a call on Signal4, LLC.’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives Signal4, LLC. a clear view of whether the business is a risk for originating illegal robocalls. Signal4, LLC. has never received a request for high-volume origination services. However, were Signal4, LLC. to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

“Know-Your-Upstream Provider”

Procedures Signal4, LLC. has connections with only two upstream providers (Clearly-IP and Vitelity) and we know these providers very well. Before accepting traffic from any new upstream provider, Signal4, LLC. would exercise due diligence and seek to ensure that the provider is not using Signal4, LLC. to carry or process a high volume of illegal traffic. Specifically, Signal4, LLC. would collect information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Stir / Shaken Compliance

As part of STIR/SHAKEN compliance, Vitelity will sign and provide attestation for outbound call services. Signing will use a Vitelity certificate with unique customer identification so any complaints submitted to our robocall mitigation process via industry channels can be traced to specific customers on the Vitelity platform. If a customer chooses to self-sign calls, we will pass through attestation headers. Inteliquent can alternatively provide hosted STIR/SHAKEN services (where we would sign on your behalf with your certificate), but this is not supported on the Vitelity platform and your service would need to be migrated to the Inteliquent platform.

Commitment to Respond to Traceback Requests

Signal4, LLC. commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.