

Robocall Mitigation Plan

Background

Federal Communications Commission (“FCC” or “Commission”) in the Pallone-Thune Telephone Robocall Abuse has adopted rules requiring voice service providers, like ISANtre to implement STIR/SHAKEN caller ID authentication technology in the Internet Protocol portions of their networks. 47 CFR§64.6301.

The FCC requires that all voice service providers certify, by June 30, 2021, in the Commission’s Robocall Mitigation Database whether they have implemented STIR/SHAKEN or, if subject to an applicable extension, that they have documented and instituted a robocall-mitigation plan to help combat the origination of illegal robocalls on their networks. ISANtre is entitled to the FCC’s extension for small voice service providers. 47 C.F.R. § 64.6304.

ISANtre is dedicated to stopping illegal calls from originating on its network and undertaking commercially reasonable efforts to monitor the calls coming into its network, consistent with FCC regulations and its “Best Practices” guidance.

This document outlines ISANtre’s Robocall Mitigation plan:

Terms of service. Know your customer.

Isantre does not allow robocalling on its network in any form. Our customers are banned to record voice messages and use them in any way, either manually or automated. All voice communications originating from our network involve human beings using tools to talk to other people in real time. No outside, unauthorized access is allowed on our network whatsoever. All users are bound by a terms of service policy that explicitly bans the practice of robocalling. ISANtre signs up each customer before providing access to the network, no unauthenticated calls are processed on our systems.

Our clients can only make calls from IP Phones that we provided and provision for our private network. They don’t have access to the IP PBX. Therefore our clients **CAN NOT** make Robocalls via our system.

Telephone Number Authorization and STIR-SHAKEN Capabilities

Isantre is diligently pursuing the deployment of STIR/SHAKEN in the IP portions of its network but has not completed that process as of the filing of this Plan. Given ISANtre’s status as a SVSP, it is subject to the Commission’s two-year extension. Because ISANtre provides a forwarding service our end users can use numbers that has been assigned from a different service provider.

Proactive Network Monitoring

If ISANtre detects a pattern consistent with illegal robocalls, or has reason to suspect illegal robocalling or spoofing is occurring on its network, ISANtre would take prompt action to identify the party that is using its network to carry these calls and take appropriate action. If ISANtre detects or suspected unlawful traffic is discovered, ISANtre would block any further traffic from being carried associated with the Media IP address of that suspicious traffic.

Traceback cooperation

ISANtre commits to timely cooperating with and responding to Traceback requests from the ITG (or any successor entity designated by the FCC), trace-forward investigations, and other valid law enforcement and government demands, subpoenas, and other valid legal processes. ISANtre will dedicate sufficient resources to provide prompt and complete responses to such requests.

ISANtre will investigate suspicious activity found by its monitoring systems or reported to it by consumers or third parties and take appropriate action.