

Robocall Mitigation Program Description

Starnik Solutions

1. Introduction

This document outlines Starnik's Robocall Mitigation Program as required under 47 CFR § 64.6305(d)(ii)-(iii) to prevent and mitigate robocalls. Our program is designed to comply with the Federal Communications Commission (FCC) regulations and is part of our commitment to ensuring a safe and reliable communication experience for all our customers.

We provide a software as a service (SAAS) solution to utilities and other organizations that send utility bills across the United States. We integrate with Bandwidth Inc., a voice service provider, to offer communication features to our customers. These tools empower utility providers to deliver voice recordings about account updates or emergency notifications (such as water boil notices or outages) to their customers.

Usage of these modules is strictly regulated, as our application prohibits robocalls and is designed exclusively for utility-related communications. As a responsible member of the telecommunications ecosystem, we are dedicated to preventing illegal robocalls and maintaining full compliance with FCC regulations.

2. Robocall Mitigation Strategy

Starnik implements a comprehensive strategy to mitigate the risks associated with robocalls. The key elements of our program are as follows:

STIR/SHAKEN Implementation: Our service provider (Bandwidth) has fully implemented the STIR (Secure Telephone Identity Revisited) and SHAKEN (Signature-based Handling of Asserted Information Using Tokens) protocols for call authentication. This advanced technology enables the verification of incoming and outgoing calls, significantly reducing the risk of spoofed robocalls and enhancing the security of our communications.

Caller ID Authentication: Our service provider (Bandwidth) uses caller ID authentication technologies to ensure that calls originating from our network are correctly identified and not flagged as spam or robocalls by customers or third-party services.

3. Communication Restrictions

Only customers that are licensed for the communications modules are able to send messages or calls. We screen our customers thoroughly to ensure that messages only relate to utilities or account updates regarding their service.

Frequency and Timing Controls: We have implemented strict rules regarding the frequency and timing of automated messages to prevent over-communication and ensure that messages are sent within acceptable hours.

4. Monitoring and Auditing

Continuous Monitoring: Our team routinely monitors for any signs of robocall activity. We block suspicious traffic patterns associated with robocalls.

Audit and Reporting: We maintain detailed audit logs of all outgoing communications, which are regularly reviewed to ensure compliance with our robocall mitigation plan. Any violations or issues are promptly addressed.

5. Customer Education

Robocall Awareness: We request our customer to provide information to the end user on how to identify legitimate calls from their licensed version of our system and how to report suspected robocalls.

6. Vendor and Third-Party Management

Vendor Compliance: We ensure that all third-party vendors involved in our communication processes comply with our robocall mitigation requirements.

7. Program Updates and Continuous Improvement

Ongoing Evaluation: We regularly review and update our robocall mitigation plan to address evolving threats and regulatory requirements.

Regulatory Compliance: We ensure that our program remains fully compliant with all relevant laws and regulations.

Traceback Cooperation: We commit to responding to traceback requests within 24 hours, providing all relevant information to assist in identifying the source of illegal robocalls.

8. Conclusion

Starnik is committed to reducing the impact of robocalls and ensuring that our communication practices are secure, transparent, and compliant with all applicable regulations. Our robocall mitigation program is an integral part of our ongoing efforts to protect our customers and maintain the integrity of our services.