

To combat the abuses of robocalling, STACKTECH LLC is actively working to implement the most robust call authentication framework possible, while also working diligently to stop illegal number spoofing.

We have adopted a three-pronged operational approach (prevent, detect, and mitigate) to stop and prevent illegal robocalls, while also expanding on industry efforts and best practices, as well as aligning with the Federal Communications Commission's (FCC) guidance:

[FCC Adopts Rules to Help Block Illegal Robocalls](#) [Robocall Blocking NPRM and NOI](#)

Here's the summary of our operational procedures to stop and prevent illegal robocalls:

Prevention

STACKTECH LLC is working vigorously to prevent unlawful robocalls originating from our network. We have implemented a stringent screening process that prevent companies with potentially fraudulent robocalling traffic from becoming STACKTECH LLC customers. We have also informed and empowered our customers with the information necessary to identify these unlawful calls, as defined by the FCC.

Detection

STACKTECH LLC has an extensive fraud mitigation team dedicated to identifying and analyzing potential robocall campaigns on our network, and determining if they are lawful or not. In alignment with the FCC rules, STACKTECH LLC is in the midst of augmenting its robocall detection technology that identifies and blocks unlawful robocalls from traversing our network.

Mitigation

Once an unlawful robocall campaign is detected, STACKTECH LLC takes several steps to stop all current and future unlawful calls. We have developed call blocking tools that prevent calls with specific unlawful ANI/'FROM' TN characteristics from traversing the STACKTECH LLC network. STACKTECH LLC personnel regularly analyzes network traffic looking for unlawful robocall campaigns and utilizes our call blocking tools when appropriate. We work diligently with our customers to stop all detected unlawful robocall campaigns and proactively communicate with those customers that may be in the path of unlawful robocalls.

STACKTECH LLC utilizes several systems and proprietary processes to detect and block unlawful robocalls that have the following types of ANIs, defined by the FCC as unlawful:

UNALLOCATED: A valid NPA NXX XXXX in the North American Numbering Plan (NANP), but NOT assigned to a carrier, nor in the LERG. Any call that contains a phone number in the ANI / From field that has not yet been released for public consumption from the NANP.

INVALID NUMBER: A complete telephone number (TN) that is NOT VALID, but of the correct format [2-9][0-9][0-9] [2-9][0-9][0-9] [0-9][0-9][0-9][0-9] (i.e., 10 digits in length, 1st and 4th are [2-9] all others are [0-9]). Any call that contains a character string of digits or letters that doesn't fully comply with E.164 formatting and the Local Exchange Routing Guide (LERG). This includes ANI / From fields with all digits of the same number, or anything less than 10 valid digits assigned from the NANP.

INVALID DIGITS: The calling party number is numeric, but doesn't fit into a category defined above (i.e., all 1's, all 0's, partial entries <10 digits etc.).

INVALID ALPHA-NUMERICS: Invalid alphanumeric strings used to misdirect, impersonate, disguise, or deceive SIP signaling.

For fraud prevention, detection, and mitigation, STACKTECH LLC:

Uses machine-learning technologies to detect voice network traffic anomalies, cost anomalies, and geographic