

Robocall Mitigation Policy

Robocall Mitigation Compliance

Date	On behalf of	Change Summary
January 1, 2024	Micro-Innovation, LLC	Version 1.0

Objective:	Establish and follow a policy that is compliant with TRACED Act
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I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Micro-Innovation, LLC, an MSP VoIP PBX service provider. Micro-Innovation, LLC manages IT infrastructure and all IT communication needs including VoIP Hosted PBX and On-Premise PBX Systems with termination.

Micro-Innovation, LLC partners with a trusted provider to implement STIR/SHAKEN on its PBX service.

II. General Prohibition Against Illegal Robocalling

Micro-Innovation, LLC does not allow the following on its service offerings:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Micro-Innovation, LLC service to engage in or in connection with fraudulent activities

If an End User is found to be violating any of the above and/or participating in Robocalling, they will be notified that Micro-Innovation, LLC may take action up to suspension or termination of service for the violation, and acknowledgement will be need to reinstate a suspension of services stating what was done to keep that traffic off our network

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III. Customer Review Process

Micro-Innovation, LLC utilizes a customer review process technique. Micro-Innovation, LLC is a small provider that maintains a close relationship with its customers. Its customers are generally small businesses and few of its current customer base have enough call volume each month to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Micro-Innovation, LLC has a call trunk state limit to prevent large amounts of calls in a short period of time. Depending on the customer this limit can change with their needs and subject to review before implementing.

Micro-Innovation, LLC has a screening for new customers requesting high volume calling capability levels (to which currently we do not entertain):

- We will not deploy high volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting high volume calling capability must provide verification as to the nature of the business, and a needs assessment.
- A Micro-Innovation, LLC rep may visit the physical premise of the business to verify the number of users at the location is appropriate for the volume of calling.

IV. Network Monitoring

Micro-Innovation, LLC is continuing investigating into solutions that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. This would then alert a Micro-Innovation employee or automated system to temporarily turn off the SIP/RTP path until investigated further.

V. Traceback and Enforcement Cooperation

Micro-Innovation, LLC will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Micro-Innovation, LLC will dedicate sufficient resources to provide prompt and complete responses to traceback requests.