

Robocall Mitigation Program Description

1. Company Overview

Sachi International, Inc (dba Wire2Air) provides **voice services** through virtual numbers and acts as an **intermediate provider** by receiving calls on behalf of customers and forwarding them to landline or other destinations. We do not directly connect to the Public Switched Telephone Network (PSTN); instead, we rely on third-party partners such as **Bandwidth** and **Twilio** to route and terminate calls to their respective networks.

2. Compliance with Robocall Mitigation Regulations

As an intermediate provider in the telecommunications ecosystem, **[Your Company Name]** is committed to adhering to all applicable **FCC** regulations concerning robocall mitigation. In accordance with the **TRACED Act**, we have developed a comprehensive **Robocall Mitigation Program** to prevent the delivery of fraudulent or illegal robocalls.

We understand that while we may not be directly responsible for originating or terminating calls to end users, we have a responsibility to ensure that the traffic we carry is not being used to propagate robocalls. To this end, our mitigation program includes the following components:

3. Robocall Mitigation Measures

A. Adoption of STIR/SHAKEN (Signature-based Handling of Asserted Information using toKENs)

We work with our upstream providers (such as **Bandwidth** and **Twilio**) to ensure that all calls we receive, forward, or route are **STIR/SHAKEN-compliant** where applicable. While we do not directly implement STIR/SHAKEN for calls within our network, we rely on our providers' implementation to ensure that calls are **authenticated** and **signed** as they enter the PSTN or are passed between providers.

- We ensure that all **STIR/SHAKEN information** (digital signatures and associated metadata) is preserved when passing calls between networks.
- For calls where STIR/SHAKEN implementation is applicable, we follow the industry guidelines and ensure that unverified or suspicious calls are flagged or blocked by our systems.

B. Partnerships with Upstream Providers

We have established contractual agreements with **Bandwidth** and **Twilio**, and any other third-party providers, to enforce **robocall mitigation** protocols. These providers have implemented robust **STIR/SHAKEN** standards, and we ensure that we only forward traffic that complies with authentication requirements.

- **Bandwidth:** As a trusted provider, we work with **Bandwidth** to ensure that calls passed through our system are verified and signed according to **STIR/SHAKEN** guidelines.
- **Twilio:** Similarly, we have aligned with **Twilio's** robocall mitigation measures, ensuring that calls forwarded through their system are appropriately authenticated.

C. Call Filtering and Blocking

Though our role is largely to forward calls, we collaborate with our upstream partners to utilize call filtering and blocking technologies that detect and block fraudulent or illegal calls. This includes utilizing technologies that identify known robocall patterns and flag suspicious calls before they are forwarded to final destinations.

We actively monitor and implement **blocklists** and **whitelists** in collaboration with our upstream providers to reduce the chances of fraudulent calls being forwarded or terminated.

D. Call Labeling

Where applicable, we support the **labeling** of calls (e.g., "Scam Likely," "Spam Risk") using industry-standard mechanisms to ensure that consumers are aware of potential threats. This is done in cooperation with upstream carriers and third-party services.

- Calls that pass through our network are tagged with appropriate labels based on their **authentication status** and **risk factors**.
- These labels are passed along with the calls when forwarded to the destination, so consumers have visibility into the risk level of the call.

E. Monitoring and Reporting

We maintain robust internal monitoring systems to track the quality and authenticity of the calls we receive and forward. This includes:

- Tracking **call volume**, **complaints**, and **block rates** related to potential robocall activities.
- Actively **responding to consumer complaints** and making necessary adjustments to our filtering, routing, or forwarding procedures to prevent future incidents.
- Providing transparent reporting to our **upstream providers** about the performance of the traffic passing through our systems.

F. Collaboration with Industry Initiatives

As an intermediate provider, we are committed to participating in **industry-wide efforts** to combat robocalls, including working with:

- The **FCC Robocall Mitigation Database (RMD)**: We have registered and updated our information in the **RMD**, providing details of our robocall mitigation efforts.

- Industry organizations and initiatives aimed at developing more effective anti-robocall technologies and protocols, such as **SHAKEN/STIR** and other caller authentication standards.

4. Future Plans for Robocall Mitigation

As part of our ongoing commitment to combatting robocalls, **[Your Company Name]** plans to:

- **Continue upgrading our systems** to integrate new and emerging technologies for robocall mitigation.
- Work with **new upstream providers** to ensure full adoption of **STIR/SHAKEN** across all networks.
- Regularly **review and update** our mitigation program to comply with new FCC regulations and industry standards.
- Stay updated on **best practices** for robocall mitigation and adapt our strategies accordingly.

5. Summary and Contact Information

In conclusion, **[Your Company Name]** is committed to preventing robocalls from propagating through our network. We rely on trusted upstream providers such as **Bandwidth** and **Twilio** to implement STIR/SHAKEN and robocall mitigation measures, while we monitor and ensure compliance with FCC regulations. We will continue to refine our practices and collaborate with industry stakeholders to help eliminate fraudulent and nuisance calls.

For additional information or inquiries regarding our **Robocall Mitigation Program**, please contact us at:

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