

Robocall Mitigation Program Description

Company Name: YanceyWorks, LLC

FCC Registration Number (FRN): 0031608151

Date: 12/29/24

1. Statement of Commitment

YanceyWorks, LLC (YW) is committed to combating unlawful robocalls and ensuring compliance with the FCC's rules under 47 CFR § 64.6305. As a reseller of SIP trunking services provided by upstream carriers such as Telnyx, Bandwidth, Flowroute, and others, YanceyWorks, LLC takes proactive measures to prevent the origination and transmission of illegal robocalls through our network. This program outlines our approach to mitigate robocall traffic, ensure compliance with STIR/SHAKEN protocols, and collaborate with upstream carriers to maintain the integrity of the Public Switched Telephone Network (PSTN).

2. Robocall Mitigation Practices

A. Traffic Monitoring and Analysis

- YanceyWorks, LLC actively monitors call traffic patterns to detect anomalies indicative of illegal robocalls, including:
 - Unusually high call volumes.
 - Short-duration calls.
 - High-volume traffic to known suspicious destinations.
- Call detail records (CDRs) are periodically reviewed for signs of suspicious activity.

B. Client Vetting and Traffic Control

- YanceyWorks, LLC maintains full control over all elements of traffic originating from and terminating to its clients, ensuring compliance with legal and ethical communication practices.
- Prior to granting access to services, YanceyWorks, LLC:
 - Conducts thorough assessments of prospective clients, including verifying their identity and intended use cases.

- Screens potential clients to ensure alignment with legitimate communication practices and compliance with anti-robocall regulations.
- Traffic patterns are continuously monitored to identify and address any potential illegal robocall activity.
- In cases of detected misuse or suspicious activity:
 - YanceyWorks, LLC reserves the right to immediately suspend or terminate services without requiring formal contractual stipulations.
 - Proactive measures are implemented to prevent further abuse, including blocking of suspicious traffic sources.

C. Coordination with Upstream Carriers

- YanceyWorks, LLC exercises full control over all client traffic before it is passed to upstream carriers such as Telnyx, Bandwidth, Flowroute, and others.
- Upstream carriers implement STIR/SHAKEN compliance and robocall mitigation measures for traffic passed from YanceyWorks, LLC.
- Through continuous monitoring and oversight of all traffic originating from its clients, YanceyWorks, LLC ensures that no illegal or suspicious traffic is transmitted to upstream carriers.
- Collaboration with upstream carriers ensures the rapid identification and resolution of any compliance issues related to illegal robocalls.

D. Call Blocking and Termination Policies

- Calls identified as originating from known or suspected illegal robocall sources are immediately blocked.
- Clients associated with repeated violations are terminated in accordance with YanceyWorks, LLC's enforcement policies.

3. Implementation of STIR/SHAKEN

- YanceyWorks, LLC ensures that all traffic originating from its clients is monitored and managed to prevent illegal robocalls before transmission to the PSTN via upstream carriers.

- For IP-based traffic, YanceyWorks, LLC relies on upstream carriers such as Telnyx, Bandwidth, Flowroute, and others to implement STIR/SHAKEN authentication and call verification.
- For non-IP traffic, YanceyWorks, LLC employs alternative robocall mitigation measures, including traffic analysis and proactive blocking of suspicious calls, to ensure compliance with FCC rules.

4. Robocall Complaint Handling and Feedback

- YanceyWorks, LLC actively monitors and investigates complaints related to robocalls originating from its clients.
- Due to the centralized control over all client traffic, YanceyWorks, LLC can quickly identify, investigate, and remediate any issues reported by consumers, carriers, or regulatory agencies.
- Complaints are addressed promptly by adjusting traffic routing, blocking suspicious sources, or implementing additional controls to prevent further violations.

5. Ongoing Evaluation and Improvement

- YanceyWorks, LLC conducts periodic reviews of its robocall mitigation practices to ensure they remain effective and up-to-date with FCC rules and industry standards.
- New technologies and methodologies for identifying and preventing illegal robocalls are evaluated for future implementation.

6. Certification of Compliance

YanceyWorks, LLC certifies that it has implemented this Robocall Mitigation Program in accordance with 47 CFR § 64.6305(d). We work diligently with upstream carriers such as Telnyx, Bandwidth, Flowroute, and others to ensure the implementation of STIR/SHAKEN and the adoption of effective robocall mitigation practices across our services.