

Robocall Mitigation and STIR/SHAKEN Policy

Company Information

Company Name: Buffalo Computer Repair LLC
FRN: 0031440431
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Fax: (716) 608-8324
Email: gordon@gdtinc.net

I. Introduction

Buffalo Computer Repair LLC is committed to compliance with Federal Communications Commission (FCC) rules regarding robocall mitigation. The company provides IT and communications services, including internal business communications and limited interconnected VoIP services offered to clients through resale arrangements. By operating in this role, Buffalo Computer Repair LLC recognizes its obligation to prevent the origination of unlawful robocalls and to comply with FCC requirements governing voice service providers. This Robocall Mitigation Policy outlines the steps Buffalo Computer Repair LLC takes to secure its communications system, verify customer use, and ensure that all calls originated through its platform comply with STIR/SHAKEN requirements, either directly or through upstream carrier partners.

II. Contact Information

Compliance Contact: Gordon Davis-Thompson, Owner
Telephone: 716-608-8324
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Email: gordon@gdtinc.net
Address: 295 Main St, Suite 947, Buffalo, NY 14203 The Compliance Officer is responsible for maintaining this policy, monitoring VoIP system integrity, and coordinating with carriers, clients, and regulators as needed.

III. Robocall Mitigation and STIR/SHAKEN Status

Buffalo Computer Repair LLC certifies compliance under ****Option 2: Partial STIR/SHAKEN Implementation****. The company originates calls for its own business use and on behalf of limited resale clients. All outbound calls are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a) and are authenticated under the STIR/SHAKEN framework through upstream carrier partners. This ensures proper attestation and authentication of calls until Buffalo Computer Repair LLC transitions to direct signing with its own SPC token and certificate. In addition to STIR/SHAKEN participation, Buffalo Computer Repair LLC applies mitigation practices described in Section IV to all calls originated on its network.

IV. Robocall Mitigation Practices

Buffalo Computer Repair LLC employs the following practices to prevent unlawful robocalls: 1. **Know Your Customer (KYC):** All clients purchasing VoIP services through resale arrangements are subject to identity verification, business registration checks, and reputational review. Higher-risk customers, such as those requesting international or high-volume calling, undergo enhanced due diligence. 2. **Traffic Monitoring:** Call patterns are regularly monitored for anomalies including short-duration call bursts, rapid sequential dialing, or abnormal failure rates. Suspicious traffic is flagged and accounts may be suspended pending investigation. 3. **Terms of Service Enforcement:** Our service agreements prohibit unlawful, spoofed, or fraudulent call activity. Violations result in immediate suspension or termination of service. 4. **Traceback Cooperation:** Buffalo Computer Repair LLC fully cooperates with traceback requests from the FCC, law enforcement, and the

USTelecom Industry Traceback Group. We commit to responding within 24 hours as required. 5. **System Security:** Our PBX servers are protected by firewalls, intrusion detection, and regular updates to minimize the risk of compromise by malicious actors. 6. **Employee and Client Education:** Employees and clients are informed about acceptable use policies and are expected to report any suspicious or abnormal call behavior.

V. Incident Response

Buffalo Computer Repair LLC maintains an incident response process to address abnormal traffic: - Identify and investigate suspicious traffic using CDRs and account records.

- Temporarily suspend the affected client or account to prevent further traffic.
- Verify with the customer whether the traffic was legitimate or unauthorized.
- If confirmed as unlawful robocall activity, permanently terminate service and notify upstream carriers and regulators as necessary.
- Document the incident, findings, and corrective actions for compliance review. This process ensures that unlawful robocall activity is quickly isolated and resolved.

VI. Continuous Improvement

Buffalo Computer Repair LLC recognizes that robocall mitigation is a continuous responsibility. To maintain compliance and strengthen protections, we commit to: - Conducting annual reviews of this policy and updating it as FCC rules evolve.

- Implementing improved monitoring and call analytics tools as they become available.
- Continuing employee and client education to prevent unlawful use of our services.
- Maintaining close coordination with upstream carriers and industry traceback groups.

Through these efforts, Buffalo Computer Repair LLC ensures its robocall mitigation program remains effective, transparent, and consistent with FCC requirements.