

Robocall Mitigation Plan

Entity Name: Sawgrass IT

Previous Business Name: Esquared Technology Advisors

FCC Registration Number (FRN): 0031541980

Business Address: 10034 Golf Club Drive, Ponte Vedra Beach, FL 32082

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1. Company Description and Role

Sawgrass IT is an end user organization that utilizes managed voice services solely for internal business communications. Sawgrass IT does not provide voice services to the public, does not resell or wholesale voice services, and does not originate calls on behalf of third parties. All outbound calling activity is limited to authorized internal users for legitimate club business purposes.

Outbound calling is provided through upstream voice service providers. Sawgrass IT does not operate its own public switched telephone network and does not originate calls for third parties.

2. STIR/SHAKEN Status

Sawgrass IT does not perform STIR/SHAKEN authentication or signing functions. Outbound calls are routed through upstream voice service providers that perform STIR/SHAKEN authentication where technically feasible.

Consistent with 47 CFR § 64.6301(a)(2) and 47 CFR § 64.6305, Sawgrass IT maintains and certifies a robocall mitigation program applicable to all outbound traffic associated with its voice services.

3. Scope of Robocall Mitigation Program

This robocall mitigation program applies to all outbound traffic associated with Sawgrass IT voice services, regardless of STIR/SHAKEN attestation status. This includes STIR/SHAKEN signed calls, partially attested calls, and unsigned calls.

4. Know Your Customer Program

Because Sawgrass IT does not sell voice services, the term “customer” refers exclusively to internal users. Sawgrass IT applies KYC-style administrative and access controls to all users and calling capabilities as outlined below.

Identity Verification and Authorization:

Phone access is granted only after verification through Sawgrass IT’s internal onboarding process. Users are identified by name, role, and department and must be authorized by department leadership. Each user is provisioned with unique credentials and role-based permissions.

Provisioning Controls:

Calling permissions are restricted based on documented business need. International and premium calling destinations are disabled by default and require explicit approval. Softphone and remote access capabilities are limited to approved devices and authorized personnel. Administrative access to voice systems is restricted to authorized IT personnel and protected by authentication controls.

Ongoing Review of Existing Users:

Existing user permissions are reviewed periodically and upon role changes. User access is disabled promptly as part of employee offboarding procedures. Requests to modify calling capabilities are reviewed for business justification and compliance risk.

5. Call Analytics and Monitoring

Sawgrass IT utilizes call detail records, monitoring tools, and analytics capabilities made available through its hosted voice platform and upstream voice service providers to monitor outbound traffic activity.

Current vendors associated with voice management and analytics include Bicom Systems/IPFone and related upstream carrier and termination providers responsible for call routing, traffic monitoring, and STIR/SHAKEN implementation where applicable.

Monitoring activities include review for abnormal outbound call volume, repeated short-duration calls, unusual destination patterns, unauthorized international calling activity, excessive concurrent calling activity, and indicators of compromised accounts or robocall behavior.

Sawgrass IT does not permit autodialing, robocalling, telemarketing, lead generation, or mass outbound calling activity on its systems.

6. Mitigation and Response Measures

If suspicious or potentially illegal activity is identified, Sawgrass IT takes reasonable and appropriate mitigation measures, which may include investigation of activity, credential resets, access restriction, reduction or removal of calling permissions, account suspension or disablement, and escalation to upstream voice providers as needed.

Sawgrass IT prohibits use of its systems for illegal robocalling activity or unauthorized traffic origination.

7. Traceback Cooperation

Sawgrass IT commits to respond fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement agencies, and recognized industry traceback organizations, and to cooperate in investigations and mitigation efforts as required by applicable FCC rules.

8. Recordkeeping

Sawgrass IT maintains reasonable records related to this robocall mitigation program, including provisioning records, access records, call logs, and documentation of investigations or mitigation actions taken.

9. Regulatory Actions and Investigations

Sawgrass IT, previously operating under the business name Esquared Technology Advisors, was identified in the Federal Communications Commission Enforcement Bureau Order titled “In the Matter of Robocall Mitigation Database Filers,” released August 25, 2025 (DA 25-737).

The regulatory agency involved was the Federal Communications Commission Enforcement Bureau.

The action commenced following FCC and Wireline Competition Bureau notices regarding deficiencies in the Company’s Robocall Mitigation Database certification and mitigation plan filings associated with updated February 26, 2024 compliance requirements under 47 CFR § 64.6305.

The FCC’s findings related to deficiencies in required RMD certification information and mitigation plan disclosures, including failure to timely update required filing information under revised FCC rules. The matter did not involve a specific FCC finding that the Company engaged in illegal robocalling activity.

The Company has taken corrective action by updating and supplementing its Robocall Mitigation Plan, compliance procedures, KYC controls, traceback commitments, and related filing disclosures in an effort to maintain compliance with applicable FCC robocall mitigation requirements.

As of the date of this filing, the Company continues to cooperate with the FCC regarding its RMD compliance obligations. No additional forfeiture order or separate enforcement penalty related to illegal robocalling conduct has been issued against the Company.

10. Certification

This Robocall Mitigation Plan is accurate and complete to the best of Sawgrass IT's knowledge and is maintained in compliance with 47 CFR § 64.6305.