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Feb 1, 2024

FCC - Robocall Mitigation Letter

To whom it may concern.

Indian River Networks limits VOIP calls to only its upstream provider which has the obligation for full STIR/SHAKEN implementation.

The Paragraph 40 of the FCC's First Call Authentication Report and Order (FCC 20-42) excludes providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN from implementation obligations. Because Indian River Networks, LLC lacks control over the necessary facilities and network infrastructure, it is not required to implement STIR/SHAKEN pursuant to paragraph 40. Instead, Indian River Networks, LLC relies on its underlying carrier partner to implement and utilize STIR/SHAKEN and does its part by ensuring its own clients are not able to place calls outside of the upstream provider.

The following outlines and details the steps taken to avoid originating illegal robocall traffic as part of our robocall mitigation program:

- 1) We resell VoIP services from Bandwidth and therefore do not have or own any VoIP Switching Facilities. As a reseller, we have no control over the VoIP Switching Facilities.
- 2) Cooperation in Contracts: We have made sure our contract is clear about the kind of traffic it will (and will not) accept from its customers. We have notified them that if they do not follow the rules, they will be subject to prompt termination. If they are found sending calls that we believe are illegal, they will forfeit confidentiality, and their information will be shared with enforcers and industry partners.
- 3) We have made significant efforts to know our customers and confirm the identity of new commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, and the nature of customer's business. We make sure any suspicions are allayed before turning on service and do not give anonymous test accounts to auto-dialers.
- 4) We take quick action and follow a plan that allows us to act promptly and decisively on anything suspicious detected by our monitoring. If we get a traceback notice for an illegal robocall, it does not leave the issues unresolved but rather, we insist on specific, deterministic explanations with explicit corrective actions for our customers.
- 5) We can, do, and will perform Call Blocking destined to specified phone numbers as appropriate for robocall mitigation.
- 6) We cooperate with investigative bodies and stand ready to comply with requests by law enforcement and the FCC.

Sincerely,

Richard E Smith
President
Indian River Networks, LLC