

ShoreWaves LLC
Robocall Mitigation Plan
January 31, 2025

STIR/SHAKEN IMPLEMENTATION

STIR/SHAKEN has been implemented and is signing all ShoreWaves network originated calls, both from customers and official company business.

ROBOCALL MITIGATION

The Company has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its network. All calls that transit Company's network are subject to the described robocall mitigation program.

Background

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback:

The Company will respond to all traceback requests from the FCC and authorities covered by then-current regulations within 24 hours.

Traceback Contact Information

Name	Title	Contact Information
Steven Fitzgerald	Telephone Operations Team Lead	Ph: 906-523-9370 Email: phoneops@shorewaves.net

2. Take Steps to Mitigate Illegal Traffic

If the Company is notified of traffic patterns consistent with illegal robocalls, or has reason to suspect illegal robocalling is transiting our network, the Company will identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. The action taken will enforce the FCC goal of zero robocalls entering the public network.

3. Measures to prevent origination of illegal calls

Know Your Customer:

The Company only serves low risk customers who all have a personal interaction with a representative from the Company. All customers are vetted by collecting a physical billing address, which the Company visits to install the telephone service. All customers are retail, with limits on the number of concurrent calls allowed per assigned telephone number.

Telephone Number Validation:

Customers use numbers assigned by the Company, which are set in originated calls by the telephone switching system. This enables Company to provide “A” level attestation of all originating calls.

Network Monitoring:

The Company monitors call detail records and SIP trunk billing information for signs of suspicious activity.

Call Blocking:

For calls originating from the Company network, the Company provides the following Robocall Protections—

- A TN suspected of originating illegal calls will be suspended from making all but emergency calls while the Company investigates further.
- Confirmed illegal call activity from a TN will result in appropriate action to block future call originations from the TN and/or the customer assigned the TN.