



Robocall Mitigation Plan

Created By Richard Cook

Approved By Nathan Whittacre

Version	Date	Changed By	Comments
1.0	04/15/2022	Richard Cook	Initial Version



Robocall Mitigation Plan

Stimulus Technologies of Missouri LLC ("Stimulus") is a telecommunications company located in Missouri, serving both the Consumer and Business markets. The voice over IP service has fewer than 100,000 subscribers, most of which are within the Business market.

Stimulus will monitor industry best practices and continuously improve our internal processes to ensure this plan and our systems adapt to the changing needs of our customers and provide the best service to the public.

Extension Qualification

Pursuant to 47 C.F.R. §64.6304(a) – Extension of implementation deadline; Stimulus qualifies for the extension, until June 2022, due to its low number of subscribers.

Traceback Requests

Stimulus affirms that it follows procedures for ensuring it knows the identities of its customers, especially ones whose service permits them to engage in high volume calling campaigns, such as businesses engaged in telemarketing or contacting their customers for legitimate purposes. To the extent that we were to receive information from law enforcement or other sources that a customer is engaged in illegal calling, our policy is to cooperate fully, including by providing the identity of any suspected illegal robocallers pursuant to legal service of process.

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Robocall Mitigation

1. Stimulus limits the number of SIP registrations and the number of channels on a per customer basis. SIP PBX subscribers are provided with the option to set outgoing call limits on the number of simultaneous originating calls. Call thresholds are monitored during regular business hours and system logs are reviewed daily.
2. Stimulus currently does not allow the SIP subscriber to change the outgoing Caller ID number.
3. Stimulus has a procedure in place to confirm the identity of new residential and commercial customers by collecting information such as physical location, contact person(s), federal tax ID as well as other personally identifiable information including but not limited to the nature of their business.



4. Stimulus regularly examines and analyzes its traffic make-up. If the analysis indicates the presence of likely illegal robocalling, management is alerted, and they follow defined procedures on investigating the consumer who is generating the suspicious traffic. The procedures include but are not limited to:
 - a. Checking recent and past call detail records and benchmark them against expected trends
 - b. Checking recent and past account activity and purchasing
 - c. Investigating if any system issue generates the abnormal traffic patterns
 - d. Verifying that the call originating path is valid
 - e. Contacting the customer to understand his/her particular use case and validate that the activity belongs to that customer

Stimulus is committed to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.