

Prestige Call Center

Robocall Mitigation Plan

1. Proactive Blocking (Network-Level)

We implement real-time, multi-layered blocking to prevent illegal robocalls from entering or exiting our network.

- **Do-Not-Originate (DNO) Lists:** Permanently block all calls where the calling number appears on the **US Telecom** or **Neustar** DNO lists.
- **Invalid Numbers:** Block calls originating from:
 - Unallocated or unassigned NXX codes.
 - Invalid area codes (e.g., 000, 555 reserved, 911 misused).
 - Numbers not conforming to NANP (North American Numbering Plan) formatting.
- **High-Risk ANI:** Block calls from numbers known to be used exclusively for illegal robocalls (based on real-time threat intel feeds).
- **STIR/SHAKEN Enforcement: Block** any call with a "Gateway" attestation (B) or "Partial" attestation (C) if the calling number appears on a DNO list or exceeds our volume ratio policy.

2. Know Your Customer (KYC) & Customer Vetting

We apply rigorous customer identification and contracting to prevent bad actors from gaining access.

- **Mandatory Collection (pre-service):**
 - Legal business name & physical address (verified via utility bill or lease).
 - Contact name, phone, and email.
 - Federal Tax ID (EIN) or SSN for sole proprietors.
 - Description of calling campaign (e.g., appointment reminders, debt collection, surveys).
- **Customer Certification (signed agreement):** Customer must certify that:
 - They will not originate illegal robocalls.

- They will not spoof a number they do not have legal right to use.
- They will only call numbers with prior express consent (where required).
- **Ongoing Verification:** Re-verify KYC information annually or if suspicious traffic patterns emerge.

3. Traffic Monitoring & Analytics (Proactive Detection)

We continuously analyze traffic to identify patterns consistent with illegal robocalls.

- **Volume Analysis:** Flag any customer originating > [X,000] calls per hour to unique DIDs (short duration calls).
- **Call Duration:** Flag calls with average duration < 6 seconds (potential ringless voicemail or answer detection abuse).
- **Caller ID Consistency:** Flag if the calling number does not match the customer's assigned number block (spoofing detection).
- **Originating IP Reputation:** Block traffic from IP addresses associated with known robocall botnets or VPN/proxy services.
- **Automated Alerting:** Real-time alerts sent to [Network Operations Team] when thresholds are exceeded.

4. Traceback Response & Industry Cooperation

We fully cooperate with the **Industry Traceback Group (ITG)** and law enforcement.

- **Response Time:** Respond to all traceback requests within **24 hours** (or less, if requested by ITG).
- **Designated Contact:** [Name/Title/Email] is our single point of contact for traceback requests.
- **Data Retention:** Retain call detail records (CDRs) for a minimum of **24 months** to support tracebacks.
- **Traceback Escalation:** If a traceback identifies one of our customers as the originator, we will:
 - Notify the customer within 4 hours.
 - Demand immediate cessation.
 - Suspend the customer if no satisfactory response within 24 hours.

5. Compliance Assurance & Enforcement (Remediation)

We apply progressive discipline to customers who violate robocall rules.

- **First Complaint (Internal):** Customer is notified and must provide a written explanation and evidence of consent (if required).
- **Second Complaint (Hold):** All traffic from the offending customer is **immediately put on hold** pending investigation.
- **Verified Violation (Termination):** If an illegal robocall is confirmed, we **terminate the customer** and file a report with the FCC Enforcement Bureau.
- **Repeat Offender Block:** Terminated customers are added to an internal blacklist and rejected from future onboarding.

6. Customer Education (Friendly & Proactive)

We help legitimate customers stay compliant.

- **Onboarding Packet:** Every new customer receives a plain-English guide: *“How to Avoid Robocall Violations”*.
- **Quarterly Webinars:** Free training on STIR/SHAKEN, consent tracking, and calling best practices.
- **Compliance Portal:** Customers can self-check their numbers against DNO lists and see their current complaint status.