

Robocall Mitigation Plan

Company Name: Enhanced Business Communications (EBC)

Service Type: VoIP Provider — Direct to End Users

Upstream Carrier: Bandwidth Inc.

1. Certification Statement

Enhanced Business Communications LLC certifies that all voice traffic originating on its network is subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), including reasonable steps to prevent the origination of illegal robocalls and spoofed calls.

2. STIR/SHAKEN Implementation Status

Enhanced Business Communications LLC certifies pursuant to 47 CFR § 64.6305(d)(1)(iii) that it has not implemented the STIR/SHAKEN authentication framework on any portion of its network.

Enhanced Business Communications LLC maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a), including customer verification, traffic monitoring, traceback cooperation, suspicious traffic investigation, and prompt mitigation of potentially unlawful traffic.

Enhanced Business Communications LLC relies on its upstream carrier, Bandwidth Inc., for call routing and related carrier services and does not currently implement STIR/SHAKEN directly due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN authentication functions.

Accordingly, Enhanced Business Communications LLC is providing the explanation contemplated under 47 CFR § 64.6305(d)(2)(i).

3. Know Your Customer (KYC) and Robocall Mitigation Procedures

Customer Verification Procedures:

- Collects customer legal name, physical address, email address, and telephone number.

- Verifies business customers through publicly available databases such as Secretary of State records.
- Requires identity verification for authorized representatives.
- Reviews intended service usage including expected call volume and destinations.
- Screens customers for potential risk indicators.

Traffic Monitoring and Analytics:

- Call volume thresholds monitoring.
- Short-duration call detection.
- Rapid burst calling detection.
- Customer complaint monitoring.
- Monitoring through Bandwidth carrier analytics.
- Internal monitoring through Thirdlane Technologies systems.

Vendor Usage:

- Bandwidth Inc. — Upstream carrier providing routing, authentication, and analytics.
- Thirdlane Technologies — Provides PBX and internal monitoring tools.

Response Procedures:

- Investigate suspicious traffic immediately.
- Contact customers for clarification.
- Deactivate outbound call service immediately.
- Suspend entire VoIP services if necessary.
- Terminate service if illegal activity is confirmed.
- Cooperate fully with traceback and law enforcement requests.

4. Traceback Cooperation

Enhanced Business Communications LLC commits to responding fully and within 24 hours to traceback requests from the FCC, law enforcement, and the Industry Traceback Group, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

5. Regulatory or Enforcement History

Enhanced Business Communications LLC has been subject to administrative actions related to its Robocall Mitigation Database (RMD) certification.

(1) Law enforcement or regulatory agencies involved:

Federal Communications Commission (FCC), Enforcement Bureau, Telecommunications Consumers Division, and the FCC Wireline Competition Bureau.

(2) Date the action or investigation commenced:

On March 29, 2024, the FCC Wireline Competition Bureau notified Enhanced Business Communications LLC that its RMD certification had not been updated to comply with amended FCC robocall mitigation filing requirements. On December 10, 2024, the FCC Enforcement Bureau issued the December 2024 Show Cause Order concerning deficient RMD certifications. Subsequently, on August 25, 2025, the FCC Enforcement Bureau released an order removing certain RMD certifications, including the certification of Enhanced Business Communications LLC. On March 24, 2026, the FCC Enforcement Bureau issued a further Show Cause Order (DA 26-282) directing the Company to correct identified deficiencies and notify the Bureau of corrective actions taken.

(3) Current status of the action or investigation:

Following the August 2025 removal order, Enhanced Business Communications LLC requested reinstatement and was provisionally reinstated to the RMD while corrective actions were undertaken. Enhanced Business Communications LLC has updated its RMD certification and submitted revised robocall mitigation materials addressing the identified deficiencies. The revised filing is currently pending Commission staff review.

(4) Summary of findings of wrongdoing:

The administrative actions related to deficiencies in previously submitted RMD certification materials, including failure to timely update required RMD information and submission of incomplete or inconsistent filing information. The March 2026 Show Cause Order identified additional filing consistency and disclosure deficiencies requiring correction. These actions were administrative and compliance-related in nature and did not include findings that Enhanced Business Communications LLC engaged in illegal robocalling activity, unlawful spoofing, fraudulent traffic origination, or intentional misconduct.

(5) Whether any final determinations have been issued:

No final enforcement findings, forfeitures, penalties, or determinations related to illegal robocalling activity have been issued against Enhanced Business Communications LLC. The Company's revised filing remains under review for compliance with RMD filing requirements.

6. Administrative and Compliance Contact

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Title: Operations Manager

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7. Update Commitment

Enhanced Business Communications LLC commits to updating its Robocall Mitigation Database filing within 10 business days of any material changes.