

Response to FCC Public Notice DA-24-73A1

This document outlines our comprehensive robocall mitigation plan as a Non-Gateway Intermediate Provider filing with the Federal Communications Commission (FCC). Leveraging our partnership with bandwidth.com, we utilize their STIR/SHAKEN implementation to enhance our efforts in combating illegal robocalls. In addition, our internal processes include regular audits to identify and mitigate potential robocall activity.

Robocall Mitigation Efforts and Practices:

- **Traffic Routing and STIR/SHAKEN Implementation:** As part of our strategy, all voice traffic is routed through bandwidth.com, utilizing their advanced STIR/SHAKEN technology. This partnership ensures that caller ID information is validated, significantly reducing the chances of illegal robocalls originating from our network.
- **Call Auditing Practices:** To further safeguard our network, we conduct rigorous audits of all call activity. These audits are used to identifying abnormal call patterns and intervening promptly to prevent the spread of robocall traffic.

Caller ID Integrity and Compliance Measures:

- **Restricted Caller ID Usage:** We restrict the use of caller IDs to those issued by bandwidth.com. This policy ensures that no external or unauthorized caller IDs can be used, thereby preventing caller ID spoofing and contributing to the authenticity of calls routed through our network.
- **Know-Your-Upstream Provider Procedures:** In adherence to Section 64.1200(n)(5) of the FCC's rules, we rely on bandwidth.com's diligent procedures to vet and monitor our upstream providers. This ensures that all entities in our call origination chain maintain high standards of compliance and integrity.
- **Detailed Mitigation Strategies:** We are committed to detailing specific actions within our robocall mitigation program. These include:
 - **Affirmative Measures:** Implementing proactive steps to prevent customers, both new and renewing, from originating illegal calls.
 - **Technology Utilization:** Employing sophisticated call analytics systems to analyze and alert on suspected illegal activities in real-time.
 - **Firewall:** Only allowed traffic is able to traverse to bandwidth.com
- We periodically audit the attestation of calls via ClearlyIP Attestation Service