

Robocall Mitigation Program Description

Entity: One Too Many Insurance Agency Inc. DBA Search & Save

Date: March 2026

Overview

One Too Many Insurance Agency Inc., doing business as Search & Save, operates a tightly controlled telecommunications voice service system designed to meet regulatory requirements established by the **Centers for Medicare & Medicaid Services (CMS)**. Our system is used exclusively by licensed insurance agents for the purpose of conducting and recording Medicare Advantage enrollment calls.

Outbound Calling Practices & STIR/SHAKEN

Search & Save utilizes a single, centralized phone number for all outbound calls made by our agent subscribers. These calls are strictly limited to enrollment-related communications as required under CMS guidelines.

- **Authentication:** We participate in the **STIR/SHAKEN** framework through our upstream carrier, **Bandwidth**, to ensure all outbound calls are signed with **Level A Attestation**, verifying our identity and right to use the caller ID.
- **Usage Policy:** Outbound calls are never used for marketing, cold-calling, or unsolicited sales purposes by Search & Save or our agents.

Inbound Call Handling

Subscribers (licensed insurance agents) have the ability to select forwarding numbers for receiving inbound calls. These numbers are solely used for returning calls related to Medicare Advantage enrollment communications that are recorded and stored per CMS regulations. Inbound call routing is managed to ensure compliance and accountability.

Call Analytics and Third-Party Vendors

Search & Save utilizes the advanced call analytics and reputation management tools provided by our upstream carrier, **Bandwidth Inc.** Bandwidth monitors our outbound traffic for high-volume patterns and suspicious signaling. We supplement this with internal, proprietary monitoring tools to identify and block potential illegal traffic before it enters the public switched telephone network (PSTN).

Specific Steps to Mitigate Illegal Traffic

To prevent the transmission of illegal robocalls, Search & Save has implemented the following technical controls:

- **No Autodialers:** No autodialers or robocall technologies are employed; all activity is agent-initiated and human-to-human.
- **Rate Limiting:** We enforce strict **Calls Per Second (CPS)** limits that align with human-initiated dialing, automatically flagging any automated or "burst" traffic.
- **DNO List Enforcement:** In coordination with Bandwidth, we block all calls to numbers on the **Do Not Originate (DNO)** list to prevent the spoofing of government or emergency services.
- **Short-Duration Monitoring:** Our system triggers an internal alert if an agent's account shows an unusual spike in calls lasting under six seconds.

Know Your Customer (KYC) Procedures

Search & Save applies rigorous **KYC** protocols to both new and existing subscribers:

- **New Customer Vetting:** We verify **National Producer Numbers (NPN)** against state registries and perform identity verification (government ID or business license) before granting calling access.
- **Existing Customer Audit:** We perform a mandatory **annual re-verification** of every existing agent's NPN and licensure status.
- **Continuous Monitoring:** We use automated logging to compare an existing customer's current call patterns against their established historical baseline. Any significant deviation results in an immediate compliance hold.

Use of Call Recordings & Compliance

All calls are recorded and securely stored within the proprietary Search & Save CRM platform for a minimum of **10 years** in accordance with CMS regulations. The Search & Save system is **HIPAA, SOC2, and PCI compliant**.

Traceback Commitment

Search & Save commits to fully cooperating with the **Industry Traceback Group (ITG)** and law enforcement, providing requested call signaling and subscriber information within **24 hours** of a request.

Conclusion

Our robocall mitigation strategy centers on preventing misuse, ensuring full compliance with CMS mandates, and protecting the integrity of communications between agents and Medicare beneficiaries.