

Command Health, LLC
4845 Pearl East Circle
Boulder, CO 80301

Dear FCC,

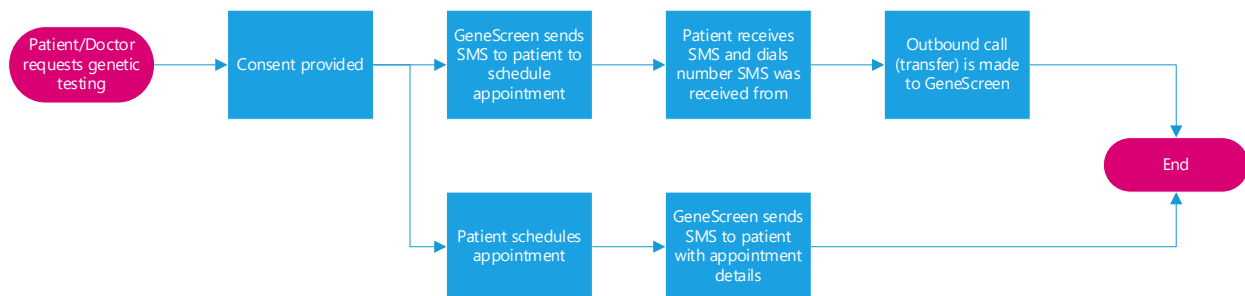
Our Voice Carrier Bandwidth.com implements a STIR/SHAKEN compliant architecture which is utilized to perform outgoing calls (essentially voice transfer) to SMS sending party.

Background:

Our implementation with Bandwidth.com is used for Toll-Free outbound + inbound SMS (Text) messages. Outbound SMS is performed on behalf of GeneScreen (Gene-Screen.com) for the purpose of scheduling appointments, e-signature/waiver, billing and shipping carrier tracking notifications. All patients provide consent for communication (Filled out form) and can opt out of SMS by replying “stop” which halts further outbound attempts.

Reasonable Steps:

In our implementation with Bandwidth.com, outgoing calls are only performed when an SMS (Text) recipient dials the number the SMS originated from. Patients are not called by an automated process. The outgoing call is initiated by the patient dialing the SMS number which forwards/transfers call to GeneScreen (where SMS originated). To limit/prevent robocalls, the call always originates on the patient end.



Sincerely,

Command Health/GeneScreen Counseling, LLC
Daniel Cabrera