

Think Anew, LLC

Robocall Mitigation Plan

Introductory Statement

Pursuant to 47 C.F.R. § 64.6305, Think Anew, LLC submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Think Anew, LLC (hereinafter referred to as “the company”) has in place to mitigate illegal robocalls. The company may modify, add, delete, or otherwise alter any of the policies and procedures described in this plan at any time to respond to changes in its business, its capabilities, and its needs.

Think Anew, LLC is currently in the process of obtaining its own certificate and intends to use Bandwidth as its certificate authority provider. Think Anew confirms that its upstream provider, Bandwidth, is certified in the FCC Robocall Mitigation Database. The company will not accept voice traffic from any unregistered provider.

1. Company Overview

Think Anew, LLC provides telecommunications services to long-term care and senior living facilities. We are committed to preventing illegal robocalls and complying with all FCC requirements.

2. STIR/SHAKEN Implementation

Think Anew operates an IP-based network and applies STIR/SHAKEN authentication to all eligible SIP traffic where technically feasible. A small amount of legacy traffic that cannot support STIR/SHAKEN is being migrated to fully compliant systems.

Think Anew follows caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

3. Robocall Mitigation Practices

We use a three-step approach:

Prevention:

- Require customers to comply with FCC rules and traceback obligations.
- Educate customers on robocall regulations.
- Enforce contractual provisions prohibiting illegal robocalls.

Detection:

- Monitor call traffic for unusual patterns using analytics and Bandwidth reporting tools.
- Use industry traceback data to identify suspicious activity.

Mitigation:

- Block calls from invalid or Do Not Originate (DNO) numbers.
 - Suspend or terminate service for customers engaged in unlawful robocalling.
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4. Customer Vetting (KYC)

Prior to installing services for new customers, Think Anew takes the following measures to prevent unlawful robocall activity:

- **Identity Verification:**
 - Collect and review entity-identifying information (legal name, EIN, address, authorized contacts).
 - Validate using public registries and FCC/ITG complaint databases.
- **Risk Assessment:**
 - Assess business type, expected call patterns, and compliance history.
 - Apply enhanced due diligence for high-risk applicants, including manual review and temporary call limits.
- **Caller ID Validation:**
 - Confirm that customers have a legitimate right to use their asserted calling numbers.
 - Use this information to determine the attestation level assigned to calls originated for that customer.

- **Compliance Certification:**
 - Require customers to certify adherence to FCC rules, STIR/SHAKEN standards, and ITG traceback obligations.
 - **Third-Party Analytics**
 - Think Anew uses **Bandwidth's** analytics and reporting tools to monitor call traffic for unusual patterns and potential robocall activity.
 - Bandwidth provides real-time alerts and traceback support to identify suspicious traffic.
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5. Upstream Provider Requirements

Think Anew requires that its upstream providers:

- Maintain a reasonable Robocall Mitigation Plan, including customer vetting and analytics.
 - Use call analytics to identify suspicious traffic.
 - Provide their KYC guidelines and accept Think Anew's compliance documentation as requested.
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6. Complaint Handling and Traceback

Think Anew cooperates fully with the Industry Traceback Group (ITG) and law enforcement. Upon receiving a traceback request:

- We promptly identify the originating customer.
 - Provide requested call detail records as permitted by law.
 - Take immediate action to stop unlawful robocall activity.
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7. Compliance Contact

Compliance Officer:

Name: Stacey Yoakum

Email: telecommanagement@thinkanew.com

Phone: 1-888-551-9296

8. Ongoing Commitment

Think Anew will:

- Complete migration to full STIR/SHAKEN coverage.
- Maintain strong KYC and monitoring processes.
- Continue working with Bandwidth and industry partners to stop illegal robocalls.