

Robocall Mitigation Program Description for Perfect Storm

As a non-gateway intermediate provider that does not originate calls, we rely on the STIR/SHAKEN implementation provided by our voice service provider, Bandwidth. Information regarding their STIR/SHAKEN implementation can be found here: <https://support.bandwidth.com/hc/en-us/articles/1500007690922-STIR-SHAKEN-Inbound-Verification>. As a non-gateway intermediate provider that does not receive unauthenticated SIP calls directly from originating providers, and who lacks control over the network infrastructure necessary to implement STIR/SHAKEN, we do not have an implementation obligation.

To avoid carrying or processing illegal robocall traffic, we limit the use of our voice service to facilitating a resolution between a database contact and a database owner in order for our voice service provider to complete a transfer. Additionally, we ensure that only calls from database contacts are able to have their calls transferred to the database owner. The database owners are not able to make outbound calls using our service.

We are committed to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

We have not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.