

Robocall Mitigation Plan

Robocall Mitigation Program for CITAMED LLC

Date: September 21, 2025

Filer: CITAMED LLC

1. Company Overview

CITAMED LLC is a healthcare technology services provider supporting licensed medical practices and clinics.

Our telecommunications usage is limited to **outbound calls to patients and doctors for appointment reminders, confirmations, and necessary healthcare communications.**

- We do **not** engage in telemarketing, lead generation, or high-volume automated dialing campaigns.
 - Our mission is to provide secure, compliant, and patient-focused communications.
-

2. Role in the Call Chain

CITAMED LLC files as a **Voice Service Provider with a STIR/SHAKEN implementation obligation**, serving end-users.

- All outbound calls are originated through **Bandwidth Inc.**, a certified carrier that has fully implemented the STIR/SHAKEN authentication framework.
 - CITAMED LLC does not operate as a gateway provider or intermediate provider.
-

3. STIR/SHAKEN Implementation

All outbound calls originated by CITAMED LLC are authenticated via **Bandwidth's full STIR/SHAKEN implementation**, in compliance with **47 CFR § 64.6301(a)(1) and (2)**.

- We ensure every call includes accurate caller identity information.
 - Any clinic-provided Caller ID is verified for legitimacy before activation.
-

4. Robocall Mitigation Practices

A. Customer Vetting (KYC)

- CITAMED LLC only serves licensed healthcare providers. Each customer must submit a medical license, corporate registration, and government-issued ID for the contracting officer.
- Customers must also provide proof of ownership for each Caller ID number (carrier bill, RespOrg LOA, or equivalent). No unverified numbers are permitted.
- Records are retained for two years and audited annually.

Traffic Analytics & Monitoring:

- CITAMED LLC does not use a third-party analytics vendor. Instead, we rely on Bandwidth Inc.'s carrier-level analytics and call authentication, combined with internal monitoring.
- Bandwidth Inc. provides STIR/SHAKEN authentication, call validation, and blocking of suspicious traffic.
- Internally, we monitor call traffic daily for:
 - Excessive short-duration calls
 - High call rates inconsistent with healthcare usage
 - Calls placed outside normal healthcare hours
- Any anomalies trigger a manual review. Accounts may be suspended or terminated if misuse is detected.
- CITAMED responds to all traceback requests within 24 hours.

B. Caller ID Number Verification

- All Caller IDs used by clinics must be verified before assignment.
- Verification includes **proof of number ownership** (carrier invoice, RespOrg LOA, or equivalent).
- Any unverified or mismatched numbers are blocked from use.
- Records of verification are retained for **at least two years**.

C. Traffic Restrictions

- Calls are limited strictly to **healthcare-related purposes** (reminders, confirmations, urgent communications).
- No outbound telemarketing or lead generation is permitted.

D. Traffic Monitoring

- Outbound call traffic is continuously monitored for unusual call patterns, such as:
 - Excessive short-duration calls.
 - High call volumes inconsistent with healthcare usage.
- Suspicious activity triggers an internal review and possible suspension.

E. No Spoofing

- Caller ID is accurate and reflects only **verified, assigned numbers**.
- No manipulation or spoofing of caller identity is permitted.

F. Traceback Cooperation

- CITAMED LLC commits to fully responding to **FCC, law enforcement, or Industry Traceback Group (ITG)** requests within **24 hours**.
-

5. Principals and Ownership

- **Principal:** Lorel Crespo, CEO
 - **Parent Companies, Affiliates, Subsidiaries:** None. CITAMED LLC is an independent company.
-

6. FCC Action Disclosure

- CITAMED LLC acknowledges that it was subject to the **FCC Enforcement Bureau Removal Order (DA 25-737)** dated **August 25, 2025**, due to filing deficiencies in its Robocall Mitigation Database submission.
 - This removal was **administrative only** and **not related to illegal robocall traffic**.
 - The company has since corrected its filing, implemented enhanced **KYC procedures** and **Caller ID verification practices**, and has been **provisionally reinstated in the RMD** as of **August 28, 2025**.
-

7. Certification

CITAMED LLC certifies that:

- It has implemented the robocall mitigation practices described herein.
 - It has not been prohibited by Commission action from filing in the Robocall Mitigation Database.
 - Its prior removal was administrative in nature (DA 25-737) and has been cured.
 - It will maintain and update its robocall mitigation practices as required by FCC rules.
 - It will update its filing within **10 business days** of any change to the information contained in this plan.
-

Contact for Robocall Mitigation Issues

Lorel Crespo, Chief Executive Officer
CITAMED LLC
90 Calle San Martin, Guaynabo, PR 00968
Phone: 787 459-6770
Email: bmateo@citamed.net