



Robocall Mitigation Plan

Last Updated: December 16, 2024

1. Overview

AVAJEN, LLC (“AVAJEN”) is a voice service provider that currently has **not** fully implemented the STIR/SHAKEN framework. Pursuant to 47 C.F.R. § 64.6305(a), AVAJEN maintains this Robocall Mitigation Plan to demonstrate how we actively mitigate the origination of illegal robocalls on our network. AVAJEN certifies this plan with the Federal Communications Commission (FCC) and will keep it updated to reflect any changes.

2. Commitment to Cooperation and Traceback

- AVAJEN **commits** to respond fully and in a **timely manner** to all traceback requests from the FCC, other regulatory agencies, law enforcement, and the U.S. industry traceback consortium.
- AVAJEN **cooperates** with these entities in investigating and stopping any illegal robocaller that may attempt to use its service to originate calls.
- AVAJEN **maintains clear points of contact** to facilitate efficient responses to traceback requests.

3. Know Your Customer (KYC) Practices

- **Subscriber Vetting:** All of AVAJEN’s subscribers are 100% managed and vetted in-house. We conduct identity verification and service-use assessments before activating any new end-user.
- **Restricted Caller ID Configuration:** End users cannot modify their own Caller ID settings, ensuring that the Caller ID presented is accurate and authorized.
- **Account Monitoring:** We actively monitor subscriber accounts for unusual calling patterns or traffic spikes. If abnormal activity is detected, we investigate immediately and take appropriate action, such as suspending the account or blocking suspicious calls.

4. Robocall Mitigation Measures

AVAJEN has implemented the following measures to detect and mitigate illegal or fraudulent traffic:

1. Blocking of Invalid Numbers

- AVAJEN blocks calls from invalid or unallocated North American Numbering Plan (NANP) numbers.
- We regularly update our blocking lists to ensure we capture newly invalid or unallocated number ranges.

2. Blocking of Identical Origin and Destination Numbers

- Calls where the calling number and called number are the same are blocked, preventing common spoofing tactics.

3. Blocking of Caller IDs Reported as Fraudulent

- AVAJEN proactively blocks Caller IDs reported as fraudulent by subscribers, partner carriers, industry registries, or other reputable sources.
- We maintain an internal database to track reports and ensure prompt blocking of verified fraudulent numbers.

4. **Monitoring & Anomaly Detection**
 - We leverage traffic analytics and monitoring systems to detect suspicious high-volume or short-duration calling patterns.
 - Any flagged traffic is immediately investigated; if the call patterns appear illegal or fraudulent, AVAJEN will block such traffic and take further measures against the customer account when warranted.
5. **Procedures for Handling Violations**
 - **Investigation:** Upon receiving a complaint or detecting suspicious activity, AVAJEN promptly investigates to identify the subscriber(s) responsible.
 - **Remediation:** If we confirm the subscriber is originating illegal robocalls, we will either suspend or terminate service and block related call traffic.
 - **Collaboration:** We report findings to law enforcement, the FCC, or industry traceback groups as necessary.
6. **STIR/SHAKEN Implementation Status**
 - AVAJEN acknowledges that while it has **not yet** fully implemented STIR/SHAKEN on its IP-based traffic, we are assessing or pursuing a solution (third-party vendor or in-house platform) to reach full compliance.
 - Until STIR/SHAKEN is fully operational, AVAJEN will continue to follow and enhance the robust robocall mitigation measures outlined herein.
7. **Ongoing Compliance & Updates**
 - **FCC Robocall Mitigation Database:** AVAJEN has filed this plan and will update its filing as circumstances change.
 - **Periodic Audits:** AVAJEN conducts periodic internal audits of its robocall mitigation efforts, policies, and procedures to ensure continued efficacy and compliance.
 - **Training & Awareness:** Staff members who manage subscriber accounts or monitor call traffic receive regular training on robocall detection, mitigation techniques, and regulatory requirements.
8. **Point of Contact**

For inquiries or requests related to AVAJEN's Robocall Mitigation Plan, please contact:

 - **Name/Title:** [Insert Name and Title]
 - **Email:** [Insert Contact Email]
 - **Phone:** [Insert Contact Number]
 - **Address:** [Insert Address]

Conclusion

AVAJEN is committed to working diligently to prevent illegal robocalls from originating on its network. Through comprehensive subscriber vetting, active call monitoring, rapid incident response, and ongoing collaboration with enforcement authorities and industry traceback efforts, AVAJEN strives to uphold the highest compliance standards to protect consumers and the broader telecommunications ecosystem.