

Bit by Bit Computer Consultants

Robocall Mitigation Plan

1. STIR/SHAKEN Implementation Status

Bit by Bit Computer Consultants does not directly implement STIR/SHAKEN. Instead, we rely on our upstream carriers, Flowroute and Lumen, to perform STIR/SHAKEN call authentication and signing. All outbound calls are routed through these carriers, who are fully compliant with STIR/SHAKEN requirements and possess valid SPC tokens and certificates.

2. Mitigation Measures

Although we do not sign calls ourselves, we take the following steps to mitigate illegal robocall traffic:

- Carrier Vetting: We use Flowroute (BCMONE) and Lumen, who are listed in the FCC's Robocall Mitigation Database.
- Traffic Monitoring: We monitor call traffic patterns for anomalies and investigate any reports of suspicious activity.
- Customer Vetting: We maintain Know Your Customer (KYC) procedures to ensure our clients are legitimate and authorized to use the numbers they originate calls from.
- Complaint Handling: We respond promptly to any complaints or traceback requests from regulators or industry traceback groups.

3. Third-Party Signing Disclosure

We confirm that our carriers sign calls using their own STIR/SHAKEN certificates. We do not outsource attestation decisions. We maintain written agreements with these carriers regarding call signing responsibilities.

4. FCC Action or Investigation Disclosure

Action Title:

Removal of Bit by Bit Computer Consultants' Robocall Mitigation Database Certification

Regulatory Agency Involved:

Enforcement Bureau of the Federal Communications Commission (FCC)

Date of Action:

August 25, 2025

Current Status of the Action:

Bit by Bit Computer Consultants' Robocall Mitigation Database filing was provisionally reinstated on August 29, 2025.

In an email dated September 17, 2025, the Enforcement Bureau identified two deficiencies that must be addressed by October 1, 2025:

1. The Company does not describe the action or investigation that it was subject to.
2. The Company's RMD plan does not provide a sufficiently detailed Know Your Customer (KYC) plan, such as failing to indicate whether the Company uses a third-party vendor for analytics and identifying that vendor.

Summary of Findings of Wrongdoing:

Bit by Bit Computer Consultants failed to comply with the Enforcement Bureau's Order issued December 10, 2024, which afforded the company a final opportunity to cure the deficiencies in its RMD certification and notify the Bureau that the deficiencies had been cured.

Additionally, on February 26, 2024, a new FCC requirement went into effect mandating that all intermediate and voice service providers must submit expanded filings to the Robocall Mitigation Database (RMD) in order to accept traffic from other providers. Bit by Bit Computer Consultants did not timely update its filing to reflect this expanded requirement, contributing to the procedural non-compliance noted in the Bureau's review. These findings relate to documentation and compliance oversight issues, not to intentional wrongdoing or illegal robocall activity.

Remedial Actions Taken by Bit by Bit Computer Consultants

To address the procedural deficiencies and compliance issues identified by the FCC, Bit by Bit Computer Consultants has taken the following corrective actions:

1. **Updated Robocall Mitigation Plan**
 2. **Enhanced STIR/SHAKEN Attestation Disclosure**
 3. **Expanded Know Your Customer (KYC) Procedures**
 4. **Internal Compliance Oversight**
 5. **Acknowledgment of New FCC Requirements**
 6. **Proactive Communication with the FCC**
- Revised the plan to include a detailed description of the FCC action and investigation.
 - Clarified the company's reliance on upstream carriers (Flowroute and Lumen) for STIR/SHAKEN call authentication and signing.
 - Confirmed that Bit by Bit does not directly sign calls but relies on fully compliant upstream carriers.
 - Provided documentation of written agreements with those carriers regarding call signing responsibilities.
 - Implemented a more detailed KYC process including:
 - Verification of business registration and tax ID.
 - Proof of number authorization.
 - Annual re-verification of customer data.

- Clarified that no third-party vendor is currently used for analytics, but committed to updating the plan if one is engaged.
- Established internal review procedures to ensure timely updates to FCC filings and ongoing compliance with regulatory changes.
- Recognized the February 26, 2024 FCC mandate requiring expanded RMD filings for intermediate and voice service providers.
- Committed to maintaining compliance with this and future regulatory obligations.
- Responded to the Enforcement Bureau's inquiries and committed to submitting all required updates by the October 1, 2025 deadline.

Final Determination:
Not yet issued.

5. Know Your Customer (KYC) Procedures

Bit by Bit Computer Consultants maintains robust KYC procedures to ensure that all customers are legitimate and authorized to use the telephone numbers from which they originate calls. Our KYC process includes:

- Collecting and verifying business registration documents, tax identification numbers, and contact information for all new customers.
- Confirming the identity of company owners and authorized representatives.
- Requiring proof of authorization for any telephone numbers used for outbound calling.
- Reviewing the intended use cases for outbound calls to ensure compliance with FCC rules and industry best practices.
- Conducting periodic re-verification of customer information at least annually, or more frequently if warranted by changes in customer activity or risk profile.
- Monitoring call traffic patterns for anomalies and investigating any reports of suspicious activity.
- Responding promptly to any complaints or traceback requests from regulators or industry traceback groups.

Bit by Bit does not currently use a third-party vendor for KYC analytics; all customer vetting and monitoring are performed internally by our compliance team. Should we engage a third-party vendor in the future, we will update our plan and filings accordingly.

6. Compliance Statement

We certify that the above mitigation practices are actively implemented and reasonably designed to prevent the origination of illegal robocall traffic. We will revise this plan as needed to remain compliant with FCC rules and enforcement actions.