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No STIR/SHAKEN implementation - Robocall mitigation

Dear Federal Communications Commission,

babelforce is a cloud communications software company from Germany providing a no code automation platform for contact centers and mid-size business and enterprises. Besides our software as a service offerings, we also provide telephony, IVR, Voicebot and SMS services to our business customers.

Our main business is based in Germany and Europe. We only have a small amount of international traffic. At the moment only two of our customers do have headquarters or subsidiaries in the USA, which is why we have a small quantity of calls coming from the USA and going out to the USA,

Due to the small business we have with the calls to the USA we have not implemented a stir shaken solution yet, but the carriers we use have it implemented.

Following you can find an excerpt of some of the steps that we have taken to avoid robotic calls:

- 24/7 First level and 2nd and 3rd level support
- Inbound call checks
- daily voice traffic monitoring with checks of key metrics like for example ACD, ASR and MOS
- Automated alerting system which checks for unusual peaks in calls and irregular patterns in call distribution
- In case of requests and complaints from our carriers we can answer as quickly as possible and we can undertake measurements to block robotic calls or any type of unusual traffic immediately
- Automated fraud detection system for national and international calls
- Billing and account balance monitoring for all of our clients
- We only use international providers and carriers that all have implemented STIR/SHAKEN

If you have any further questions please don't hesitate to contact us via the below mentioned contact details.

Christian Foerster
Chief Operating Officer