



**CONTENT PRO**  
technology concierge services

Content Pro LLC  
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## Content Pro LLC Robocall Mitigation Plan

**Date:** 12/21/2024

This Robocall Mitigation Plan is submitted by Content Pro LLC ("Provider") in compliance with 47 C.F.R. § 64.6305, as adopted by the FCC. The document outlines policies and procedures aimed at reducing illegal robocalls originating from the Provider's network. The Provider is committed to mitigating robocalls and cooperating with traceback efforts from the FCC, law enforcement, and the Industry Traceback Group (ITG).

### I. STIR/SHAKEN Implementation Status

- **STIR/SHAKEN Status:**  
The Provider has implemented the STIR/SHAKEN authentication framework on a portion of its network.
- **Implementation Scope:**
  - Fully deployed on all interconnected VoIP segments.
  - Calls originating from these segments are authenticated with industry-standard attestation data.
- **Exemptions:**  
Non-VoIP and legacy systems employ traceback and other mitigation strategies to prevent illegal robocalls.

### II. Traceback Requests

- **Commitment to Cooperation:**
  - Responds to FCC, law enforcement, and ITG traceback requests within **24 hours**.
- **Point of Contact:**
  - **Name:** Tyler Anderson
  - **Title:** President
  - **Phone:** (214) 543-5960
  - **Email:** [tyler@get-content-pro.com](mailto:tyler@get-content-pro.com)

- **Upstream Provider Cooperation:**

Includes contractual language requiring upstream providers to assist with traceback efforts and provide call origin details.

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### III. Customer Vetting Practices

- **Identity Verification:**

- Collects detailed information (e.g., physical address, business name, federal tax ID) for all new customers.

- **Service Agreements:**

- Includes terms prohibiting illegal robocalls, with violations leading to service suspension or termination.

- **High-Risk Customers:**

- Enhanced vetting (e.g., background checks, site visits) for high-risk or large-volume customers.

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### IV. Telephone Number Validation Practices

- **Single-Line Service:**

Calls originate only from assigned numbers.

- **Multi-Line Service:**

Automated processes validate that calls match assigned numbers.

- **Validation System:**

Cross-checks Caller ID information against assigned numbers.

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### V. International Call Originators

- The Provider currently does not offer international voice services.

- **Future Plans (if applicable):**

- Enhanced vetting for international customers to verify legal use of North American numbers.
- Strict number validation procedures.

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### VI. Know Your Upstream Provider Procedures

- **Due Diligence:**

- Regular evaluations of upstream providers' legitimacy.

- **Contractual Safeguards:**

- Contracts require upstream providers to implement robocall mitigation measures.

- **Upstream Provider Details:**

- **Name:** Skyetel
- **Location:** Boca Raton, FL 33487
- **Phone:** (360) 986-5200
- **Email:** [support@skyetel.com](mailto:support@skyetel.com)

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## VII. Ongoing Robocall Mitigation Practices

- **Network Monitoring:**
  - Reviews Call Detail Records (CDRs) for unusual patterns (e.g., high call volume, low completion rates).
  - Identifies suspicious activities (e.g., calls to Do Not Call registry numbers, sequential dialing).
- **Actions Taken:**
  - Initiates traceback investigations, suspends/terminates services, and reports activities to law enforcement.

## VIII. Content Pro RMD Statement

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**Content Pro LLC and its affiliates affirm that they have not been subject to any actions or investigations by the Federal Communications Commission (FCC) or any other law enforcement agency within the preceding two years concerning suspected involvement in illegal robocalling, call spoofing, or deficiencies in compliance with the Robocall Mitigation Database (RMD) certification requirements. Furthermore, Content Pro LLC commits to responding to all traceback requests from authorized entities within 24 hours of receipt, ensuring full cooperation with applicable regulations and enforcement efforts.**

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## Appendix A: Contact Information

### Traceback Request Contact:

- **Name:** Tyler Anderson
- **Title:** President
- **Phone:** (214) 543-5960
- **Email:** [tyler@get-content-pro.com](mailto:tyler@get-content-pro.com)

## Upstream Provider Information:

- **Name:** Skyetel
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## STIR/SHAKEN Implementation Details

### *Outbound Calls*

- The Provider authenticates Caller ID information by adding an "Identity" header in SIP invites, verifying the authenticity of calls.
- STIR/SHAKEN ensures the Provider can guarantee a verified relationship with the calling party for traceback purposes.

### *Inbound Calls*

- When receiving INVITEs with Identity headers, the Provider verifies the call's origin using URLs provided in the headers.
- New fields, like "X-STIR-Attestation," are added for PBX processing and include attestation levels.

### *Attestation Levels*

- **Level A (Full Attestation):**  
Verified ownership of Caller ID with the best call deliverability.
- **Level B (Partial Attestation):**  
Verified system origin, but not Caller ID ownership. May face reduced deliverability.
- **Level C (Gateway Attestation):**  
Minimal verification. Expected to experience poor call deliverability in the future.