

Partial STIR/SHAKEN Implementation for Robocall Mitigation Program

As part of our ongoing commitment to combat illegal robocalls and fraud, we have partially implemented the **STIR/SHAKEN** framework in compliance with the Federal Communications Commission's (FCC) **Robocall Mitigation Program**. While we continue to work toward full implementation, our current approach focuses on **validating that the incoming call number matches the number listed on the customer's account**.

Overview of Partial STIR/SHAKEN Implementation:

At this stage, our implementation leverages the available **caller ID authentication technology** to cross-check the incoming call's number against the number registered in our customers' accounts. This partial implementation enables us to take key steps in ensuring that calls originating from legitimate sources are accurately identified and that the caller information aligns with what is on file.

Key Features of Our Partial Implementation:

1. Caller Number Verification:

- When an incoming call is received, we verify that the caller's phone number matches the number registered with the customer's account. This ensures that the call's originating number is consistent with what we have on record for that particular account.

2. Identity Assurance:

- For calls that are validated, we ensure that the caller's identity is correctly associated with the number being used. This helps us reduce instances of caller ID spoofing where fraudulent callers attempt to disguise their identity to appear as legitimate entities.

3. Customer Protection:

- Calls that pass our validation process are less likely to be marked as potential robocalls or scams, giving consumers more confidence in the authenticity of the incoming call.

4. Ongoing STIR/SHAKEN Expansion:

- While we have successfully implemented a validation system for incoming calls, we are actively working on expanding our deployment of **STIR/SHAKEN**. This will eventually include full caller authentication across the entire network, ensuring robust protection against spoofed and fraudulent calls.

Compliance with FCC Robocall Mitigation Program:

- We are fully compliant with the **FCC's Robocall Mitigation Program** in terms of the partial deployment of STIR/SHAKEN. Our validation process aligns with the program's goals of reducing illegal robocalls, ensuring that we are taking active steps to mitigate call spoofing.
- Our mitigation plan, which includes this partial implementation, has been submitted to the FCC for review and approval, demonstrating our commitment to ongoing compliance and transparency.

Next Steps:

We are working toward the full implementation of the **STIR/SHAKEN** framework, which will allow us to authenticate the origin of all incoming and outgoing calls and provide more

comprehensive protection against fraudulent activity. In the interim, our partial implementation provides a critical layer of defense by ensuring that the incoming number matches the customer's registered information.

By continuing to improve our robocall mitigation efforts and adhering to the FCC's guidelines, we are striving to enhance the customer experience and further reduce the threat of fraudulent and unwanted calls.
