

Robocall Mitigation Plan Filing

Robocall Mitigation Plan Filing for Apt Interactive LLC

FCC Robocall Mitigation Database Filing – Revised 2025/06/11

1. Specific Reasonable Steps to Prevent Illegal Robocall Traffic

As a white-label reseller operating on the PayG LLC dba SkySwitch platform (a subsidiary of BCM One, Inc.), we leverage the comprehensive robocall mitigation infrastructure implemented by BCM One, including:

- Full implementation of the STIR/SHAKEN framework on all originating calls.
- Blocking of high-risk traffic patterns based on internal analytics and DNO (Do Not Originate) lists.
- Active enforcement of acceptable use policies and call origination limits.
- Full cooperation with the Industry Traceback Group (ITG), the FCC, and law enforcement in responding to traceback requests.

In addition to BCM One's enforcement controls, Apt Interactive LLC further limits risk by:

- Prohibiting use of our services for unlawful robocalling in our customer terms.
- Maintaining the right to suspend or terminate customer access for policy violations or suspicious behavior.
- Monitoring account-level traffic patterns to identify abnormally high call volumes or anomalies.

2. Know Your Customer (KYC) Practices

We enforce KYC policies at account creation. These include:

- Manual review of customer details and business documentation.
- Phone/email verification and validation of payment methods.
- Limiting account features for new customers until basic verification is complete.

- Denial of service for customers failing verification or associated with suspicious activity.

We rely on SkySwitch/BCM One to perform additional KYC and traffic monitoring at the platform level.

3. Analytics Systems Used

Apt Interactive LLC uses BCM One's analytics and mitigation stack via the SkySwitch platform, which includes:

- Internal data analytics to identify irregular calling patterns.
- DNO list enforcement to block spoofed or impersonated calls (e.g., government/brand spoofing).
- Call behavior monitoring tools for call-per-second and concurrency thresholds.

Where applicable, we also use PBX level dashboard tools and logs to:

- Monitor traffic trends by customer account.
 - Flag spikes in call volume, abnormal durations, or ratio anomalies.
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4. Third-Party Vendors Utilized

BCM One uses internal systems and may rely on third-party analytics tools to implement its mitigation platform. As our upstream provider, BCM One's mitigation tools extend to all white-labeled traffic carried by us through the SkySwitch platform. We do not currently use additional external analytics vendors ourselves.

5. STIR/SHAKEN Compliance

All outbound voice traffic transmitted through our platform is signed and validated via BCM One's STIR/SHAKEN implementation. We do not originate unsigned traffic and rely fully on their infrastructure for STIR/SHAKEN compliance.

6. TRACEBACK

Apt Interactive LLC commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate

unlawful robocalls. Apt Interactive will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.

I, Jacob Bepalec, submit this certification on behalf of Apt Interactive LLC, which, along side our upstream provider BCM One Inc., certify the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database has been implemented. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.