



SR Technologies, Inc DBA Weavox Robocall Mitigation Plan

Background

As part of STIR/SHAKEN enforcement, on April 20, 2021, the FCC began requiring all providers to certify in the Robocall Mitigation Database that they have fully implemented STIR/SHAKEN or have instituted a robocall mitigation program to ensure that they are not originating illegal robocalls. Our policies are aligned with this FCC regulation, as detailed below. Effective February of 2024,

The policies that SR Technologies, Inc. DBA Weavox follows as part of this program are as follows:

Know Your Upstream Provider

We have partnered with upstream providers that attest that they have partially and/or fully implemented STIR/SHAKEN requirements within its network to prevent, identify, and mitigate robocalls and other illegal or fraudulent call traffic. As SR Technologies, Inc. DBA Weavox does not have access to the upstream provider's network as a white-labeled reseller, we trust that their attestation is correct and true as evidenced by certification and public disclosure of meeting STIR/SHAKEN criteria in accordance with current FCC regulation.

SR Technologies, Inc. DBA Weavox is partnered with one upstream provider, PayG DBA Skyswitch.

PayG DBA SkySwitch (Complete STIR/SHAKEN Implementation) – 0027004217

Steps Taken to Mitigate

Our upstream providers use software to monitor outbound voice traffic and provide detailed reporting to identify suspicious traffic and generate alerts in real-time, then notifying us in near real time. Traffic that generates these alerts is that of suspected robocall traffic: calls originating from invalid numbers, unallocated numbers, numbers with poor reputation, numbers that are on a Do Not Originate list, and numbers found in the FCC consumer complaint database.

We rely on our upstream provider, PayG DBA Skyswitch, for robocall mitigation whom uses "TransNexus" and "Kamailio" for STIR/SHAKEN implementation.

In conjunction with our upstream providers, we will immediately investigate any calls reported to us by our upstream providers to determine if the caller was attempting to originate unlawful robocalls. If our upstream providers determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Know Your Customer

During the sales, onboarding, and migration process, we review each of our customers to verify that they are a valid company that performs legitimate business. We validate our customers via references, web/social media, financial standing with the losing carrier, and/or other means, such as Tax ID/FEIN collection, W-9 review, standing with the Better Business Bureau and Dun & Bradstreet rating. Most of our customers are small businesses incapable of generating large volumes of calls and engage in other business technology services with SR Technologies, Inc., so we generally understand who they are and what they do as part of a close working relationship.

Acceptable Use Policy

All of our customers agree to an acceptable use policy that includes rules around the use of their telephony service. Our customers agree that they will not use the provided service for illegal, fraudulent, or abusive calls. Customers agree that if they violate these terms that the calls will be blocked and their telephony service will be disconnected and any violations of will be subject to FCC or other law enforcement investigation, fines, and/or penalties.

Traceback

We, in conjunction with our upstream providers, will respond to all requests for traceback originating from the FCC, law enforcement, and/or the registered track consortium in a timely manner as required by the FCC and/or other entities. We will cooperate in any investigations in attempt to stop any illegal robocall activities or customers engaging in such activities in conjunction with our upstream provider.

Conclusion

SR Technologies, Inc. DBA Weavox submits this plan for Robocall Mitigation to comply with the FCC's current report and order to include downstream providers/resellers. This plan is an active work in progress as more information becomes available from our upstream providers. We will update this plan as required and necessary or if any information, upstream providers, or regulatory efforts change.