

February 1, 2025

This version replaces all previous versions

Innovative Phone Systems (DBA D&S Technologies) pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”, is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

Innovative Phone Systems (DBA D&S Technologies) is a white label provider of services and does not directly own, operate, manage, or maintain any equipment that establishes upstream and downstream connections. Innovative Phone Systems LLC (DBA D&S Technologies) has fully implemented STIR/SHAKEN in conjunction with those that provide the services as a white label provider for their products and/or services.

Innovative Phone Systems (DBA D&S Technologies) commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. Innovative Phone Systems (DBA D&S Technologies) shall cooperate with these groups to investigate and stop any illegal robocallers from using Innovative Phone Systems (DBA D&S Technologies) service to carry or process illegal calls.

When notified by the FCC’s Enforcement Bureau, Innovative Phone Systems, LLC (DBA D&S Technologies) shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis and notify the provider for the upstream / downstream service(s) for the customer identified (unless Innovative Phone Systems (DBA D&S Technologies) investigation determines that the traffic is not illegal) at such a time that Innovative Phone Systems (DBA D&S Technologies) receives actual written notice of such traffic from the Enforcement Bureau.

If Innovative Phone Systems (DBA D&S Technologies) in conjunction with the actual providers of the upstream / downstream service(s) determines that the identified traffic is not illegal, Innovative Phone Systems (DBA D&S Technologies) shall provide the Enforcement Bureau with an explanation of the reasonably concluded that the identified traffic is not illegal, and what steps were undertaken to reach the conclusion.

Innovative Phone Systems (DBA D&S Technologies) relies on those who provide services to us as a white label partner to utilize a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers.

In that, Innovative Phone Systems (DBA D&S Technologies) does not directly own, operate, manage, or maintain any equipment that establishes upstream and downstream connections. We rely on those providing these connections to utilize a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks.

Innovative Phone Systems (DBA D&S Technologies) also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

Innovative Phone Systems (DBA D&S Technologies) as a white label partner of those who own, operate, manage, or maintain the equipment that establishes upstream and downstream connections relies on those who do, to use data systems for analytics and reviews to identify illegal robocalling.

Innovative Phone Systems (DBA D&S Technologies) for its part in the Know Your Customer requirements shall make all reasonable efforts to follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group networks.

This process includes the collection and review of entity-identifying information to confirm that the party is authentic before entering into a relationship with the customer.

As a part of the customer acquisition process Innovative Phone Systems (DBA D&S Technologies) validates, when possible, that the entity has a legitimate right to use its asserted calling numbers via a copy of a phone bill and/or CSR (customer service record) no older than 30 days from the date submitted to Innovative Phone Systems (DBA D&S Technologies) that provides the individual number as well as the name(s) of the holder(s) of the service and service address(s).

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls. If a customer is identified as potentially engaged in such activities, we reserve the right to warn the customer and advise to stop, suspend and/or terminate their service(s).

Innovative Phone Systems (DBA D&S Technologies) is a white label partner to the following who provide the upstream and downstream from which is receives voice traffic:

CoreDial LLC

Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com

PayG LLC dba SkySwitch

Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com

Innovative Phone Systems (DBA D&S Technologies) reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. Innovative Phone Systems (DBA D&S Technologies) is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting Innovative Phone Systems (DBA D&S Technologies) networks.