

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of
February 2 nd , 2024	Greenwire Technology Solutions

Objective: Establish and follow a policy that is compliant with TRACED Act

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Greenwire Technology Solutions, a VOIP provider to end users.

II. General Prohibition Against Illegal Robocalling

Greenwire Technology Solutions end user services are subject to restrictions such as:

Activities normally associated with Robocalling including, but not limited to: providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call; violating any applicable local, state, or federal law; using the Greenwire Technology Solutions service to engage in or in connection with fraudulent activities.

Greenwire Technology Solutions end users are notified that Greenwire Technology Solutions may take action up to suspension or termination of service for violations.

III. Know Your Customer

Robocall Mitigation Policy

Greenwire Technology Solutions utilizes the mitigation technique of “Know Your Customer.” Greenwire Technology Solutions is a small established provider that maintains a close relationship with its subscribers. Its customers are generally local business users and none of its customer base have enough call paths to generate the high volume of traffic.

Greenwire Technology Solutions has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

Greenwire Technology Solutions has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A Greenwire Technology Solutions representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling
- All customers are personally spoke to, and purpose of calling needs are reviewed directly.
- Greenwire Technology Solutions does not allow direct access to SIP trunks, PBX systems, or VOIP authentication credentials and all phone numbers and caller ID data must be numbers held by the carrier belonging to the customer. Customers have no access to increase call paths directly and all requests are reviewed by Greenwire Technology Solutions.
- Customers only access Greenwire Technology Solutions services via a PBX Greenwire Technology Solutions controls and customers do not have the ability to change services directly.

IV. Network Monitoring

Greenwire Technology Solutions monitors its networks for larger than normal call volumes to ensure no robocalling-related activities occur.

Robocall Mitigation Policy

V. Traceback and Enforcement Cooperation

Greenwire Technology Solutions will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Greenwire Technology Solutions will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

VI. STIR/SHAKEN Implementation

All trunks currently use STIR/SHAKEN.