

BT Voice LLC Robocall Mitigation Compliance with TRACED Act

BT Voice LLC (the “Company”) 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.

STIR/SHAKEN

The Company is a reseller of VoIP services hosted by PayG LLC dba SkySwitch and do not have the capability to implement STIR/SHAKEN. Our network partner, PayG LLC dba SkySwitch, has implemented STIR/SHAKEN protocols in their IP Voice networks. The Company relies on software provided by PayG LLC dba SkySwitch to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls, and detect irregular calling patterns.

TRACEBACK

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

ROBOCALL MITIGATION

The Company is a reseller of VoIP services hosted by PayG LLC dba SkySwitch, and therein utilizes PayG LLC dba SkySwitch mitigation program. PayG LLC dba SkySwitch describes their mitigation program as follows: “PayG LLC dba SkySwitch utilizes a combination of internal tools and trusted third parties (e.g., other peer service providers, end user complaints). In coordination with the ITG, Company performs Do Not Originate (“DNO”) based upon a reasonable DNO list, which may include blocking of government and other impersonation calls. The Company updates its tools to keep ahead of and detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes internal data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.” “The process includes, monitoring the network to identify suspicious traffic patterns. Limiting customers' capacity via call per second and/or concurrent session limits. Regularly checking call patterns for possible abusive traffic.”

In addition to these mitigations by PayG LLC dba SkySwitch, the Company adheres to the Know Your Customer (KYC) requirements. The Company verifies customer identities and collects customer information in regards to Customer name/company name, customer address/company address, contact info of company principles/ownership.

The Company uses an upstream provider from which it receives voice traffic:

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

The Company 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. The Company 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 the Company's networks.