



ROBOCALL MITIGATION PLAN

900 Doris Rd.
Auburn Hills, MI 48326

WaTech Computer Services, Inc. (“WaTech”) is headquartered in Auburn Hills, MI, and offers internet service within Michigan. WaTech also offers its customers Voice Over Internet Protocol (VoIP) services as a reseller of white-labeled services offered by Skye Telecom LLC dba Skyetel (“Skyetel”) and Bulk Solutions, LLC (“Bulk”). WaTech does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, WaTech does not have the facilities necessary to implement STIR/SHAKEN. WaTech has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

WaTech follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of WaTech’s customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

WaTech’s services are targeted to small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using WaTech’s services agree to abide by the rules and regulations set forth in our Terms of Service found on our website. ([Terms of Service](#)). WaTech’s Acceptable Use language provided in our Terms of Service explicitly states “WaTech’s services may not be used for unlawful, fraudulent, offensive, or obscene activity, as determined in WaTech’s discretion. WaTech reserves the right to audit, inspect, and monitor Customer’s use of its services and to suspend or terminate Customer’s services upon a violation.”

WaTech prohibits customers/subscribers from engaging in illegal activity, creating a false Caller ID (i.e., spoofing) or robocalling. Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

III. TRACEBACK

WaTech commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, WaTech will cooperate with such entities' investigation.

IV. ROBOCALL MITIGATION

WaTech's underlying voice providers, SkyeTel and Bulk have committed to fully complying with Commission's robocall blocking requirements.

V. KNOW YOUR UPSTREAM PROVIDER

WaTech has an agreement in place with SkyeTel and Bulk to resell SkyeTel and Bulk's VoIP offerings to WaTech's customers. WaTech has confirmed that SkyeTel and Bulk are listed in the Robocall Mitigation Database.

VI. PLAN UPDATES

WaTech will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.