

Robocall Mitigation Program Description

The company is a non-facilities-based interconnected VoIP provider and does not operate its own network or STIR/SHAKEN authentication infrastructure.

All call authentication is performed by underlying carriers and platform providers.

The company maintains a robocall mitigation program that includes:

- Customer verification prior to service activation
- Monitoring traffic for suspicious or abnormal calling patterns
- Enforcement of acceptable use policies
- Cooperation with industry traceback requests and law enforcement
- Suspension or termination of service for illegal robocalling activity

The company relies on upstream providers for STIR/SHAKEN implementation and participates in preventing illegal robocalls through monitoring and enforcement practices.