

Robocall Mitigation Plan

1. Compliance Assessment:

- Conduct a thorough review of current practices to ensure compliance with FCC regulations, including the Telephone Consumer Protection Act (TCPA) and the Truth in Caller ID Act.
- Identify any potential areas of non-compliance or vulnerabilities in the existing system.
-

2. Caller ID Authentication:

- Implement caller ID authentication mechanisms such as STIR/SHAKEN (Secure Telephone Identity Revisited/Signature-based Handling of Asserted information using toKENs) to verify the authenticity of caller ID information.
- Ensure that outbound calls accurately reflect the caller's identity and are not spoofed or misrepresented.
-

3. Do-Not-Call Compliance:

- Maintain and regularly update an internal Do-Not-Call (DNC) list consisting of numbers that have requested not to receive telemarketing calls.
- Scrub calling lists against the National Do-Not-Call Registry and honor requests for DNC registration promptly.
-

4. Consent-Based Calling:

- Obtain prior express consent from recipients before placing automated calls for telemarketing purposes.
- Maintain clear records of consent, including the date, time, and manner in which consent was obtained.
-

5. Call Frequency and Volume:

- Limit the frequency and volume of automated calls to avoid excessive or harassing communications with recipients.
- Monitor call patterns and adjust calling practices as necessary to ensure compliance with FCC regulations.
-

6. Call Filtering and Blocking:

- Implement call filtering and blocking technologies to identify and block illegal robocalls and spam calls.
- Regularly update call-blocking databases and algorithms to adapt to new tactics used by spammers.

7. Employee Training and Oversight:

- Provide comprehensive training to employees involved in outbound calling operations regarding FCC regulations, company policies, and best practices for mitigating robocalls.
- Establish robust oversight mechanisms to monitor compliance with policies and procedures, including call scripts and record-keeping requirements.
-

8. Complaint Handling and Resolution:

- Establish procedures for handling consumer complaints related to robocalls promptly and effectively.
- Investigate complaints thoroughly, take corrective actions where necessary, and communicate outcomes to affected parties.
-

9. Vendor Management:

- Ensure that third-party vendors or service providers involved in outbound calling operations adhere to FCC regulations and company policies regarding robocall mitigation.
- Conduct regular audits and reviews of vendor practices to verify compliance and address any identified issues.
-

10. Continuous Improvement:

- Regularly review and update the robocall mitigation plan to incorporate new technologies, regulations, and best practices.
- Stay informed about developments in the field of robocall mitigation and adjust strategies accordingly to maintain effectiveness.

By implementing this robocall mitigation plan, we aim to ensure compliance with FCC regulations while minimizing the impact of unwanted automated calls on consumers. Effective mitigation strategies, combined with ongoing monitoring and improvement efforts, are essential for maintaining trust and integrity in our communications practices.