

1. Robocall Mitigation Program Overview:

- The purpose of this program is to significantly reduce the origination of illegal robocalls within our voice service network.
- It ensures compliance with regulatory standards and facilitates cooperation with relevant entities in investigating and stopping illegal robocallers.

2. Implementation Steps:

- **STIR/SHAKEN Authentication Framework:** We will fully implement the STIR/SHAKEN authentication framework across our entire network.
- **Portion-Specific Mitigation:** For portions of our network where STIR/SHAKEN is not yet implemented, we will establish an appropriate robocall mitigation program.

3. Robocall Mitigation Practices:

- **Avoiding Illegal Robocall Traffic:**
 - We will take reasonable steps to prevent the origination of illegal robocalls.
 - Our practices will include monitoring call traffic, identifying suspicious patterns, and blocking known offenders.
- **Traceback Requests and Cooperation:**
 - We commit to responding fully and promptly to traceback requests from:
 - The Commission (FCC)
 - Law enforcement agencies
 - The industry traceback consortium
 - We will cooperate in investigating and stopping any illegal robocallers using our service.

4. Certification and Reporting:

- We will maintain records of our mitigation efforts.
- We will submit certifications to the Robocall Mitigation Database as required by the FCC.