

I. Overview

The FCC requires that all providers certify their status in the Robocall Mitigation Database for compliance with STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Brettworks a non-Gateway Intermediate Provider of VoIP services.

Brettworks is a small voice service reseller of SIP services through Skye Telecom, LLC d/b/a Skyetel.

Brettworks partners with Skyetel to implement STIR/SHAKEN.

II. General Prohibition Against Illegal Robocalling

Brettworks end user services are subject to restrictions provided to the end user upon signing up for services.

Those restrictions and terms prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Brettworks service to engage in or in connection with fraudulent activities

Brettworks's end users are notified that Brettworks may take action up to suspension or termination of service for violation of these terms.

III. Know Your Customer

Brettworks utilizes the mitigation technique of "Know Your Customer." Brettworks is a small long established IT Service provider that maintains a close relationship with its clients. Its clients are small business users and none of our customers generate the high volume of traffic associated with robocalling. This allows us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Brettworks screens new clients to verify that they will not be requesting service for large volume calling levels.

IV. Network Monitoring

Brettworks uses Skyetel's systems for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. We also monitor our systems daily to verify that large amounts of call traffic is not happening.

V. Traceback and Enforcement Cooperation

Brettworks will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Brettworks will provide prompt and complete responses to traceback requests.