

eNet, LLC Robocall Mitigation Policy (Updated: June 8, 2024)

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

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 eNet, LLC, a local computer and network service provider. eNet, LLC serves small business clients in the states of Kansas and Missouri.

eNet, LLC is a small computer and network service and support provider that provides VoIP services to our clients by reselling service that we purchase through Skytel, Inc. Skytel, Inc provides STIR/SHAKEN service, and is compliant with §64.6301, for all SIP services that we resell.

II. General Prohibition Against Illegal Robocalling

eNet, LLC end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Its existing TOS 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 CWT service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

eNet, LLC end users are notified that eNet, LLC may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

eNet, LLC utilizes the mitigation technique of “Know Your Customer.” eNet, LLC is a small long established provider that maintains a close relationship with its clients. Its customers are generally “mom and pop” small business users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

eNet, LLC has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

eNet, LLC has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy calling capability to any residential service or at an address shown in the company records as being residential.
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business.
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions.
- An eNet, LLC representative will visit the premise of all businesses to verify the number of users at the location is appropriate for the volume of calling.

eNet, LLC serves a small number of long-time business end users with minimal calling capability that are being directly contacted to review with them eNet, LLC’s policies and efforts to prevent the eNet, LLC network from being used for illegal robocalling.

IV. Network Monitoring

eNet, LLC continuously monitors call traffic in real-time and flags call patterns indicative of potential illegal robocalling.

V. Traceback and Enforcement Cooperation

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