

Robocall Mitigation Plan for Emerald Telecom Inc

Overview

Emerald Telecom Inc specializes in delivering hosted PBX solutions and SIP trunking services to a diverse range of businesses. Our clients are exclusively business entities, primarily located in Latin America, who utilize our services for their professional communications via their own broadband internet connections. This Robocall Mitigation Plan details our robust strategies and procedures to prevent, detect, and address illegal robocalls on our network, in compliance with 47 CFR § 64.6305.

Customer Authentication

Prior to service activation, every customer is required to provide:

- A valid business address.
- Proof of business registration.
- Contact information for at least one authorized representative.
- An established online presence and a business-associated email domain.
- Payment through a business account via credit card or bank transfer.

We rigorously verify all provided information and maintain the right to deny service if any inconsistencies or suspicions arise.

Outbound Call Limits

We implement strict outbound call limitations for all customers, regulating both the number of concurrent calls and the rate of new calls per minute. These limits are customized based on the customer's business profile. For instance, a medium-sized business with 50 employees might be allowed 20 simultaneous calls and 10 new calls per minute.

Caller ID Enforcement

Emerald Telecom Inc assigns telephone numbers (DIDs) to our customers, and they may also port in existing numbers. All outgoing calls must display caller ID numbers that are associated with the customer's account. Our switching platform enforces these caller ID rules before processing calls.

Traffic Monitoring

We conduct a weekly analysis of each customer's calling patterns, evaluating metrics such as call attempt volumes, answer-seizure ratios, average call durations, and the percentage of short calls. This monitoring helps identify signs of robocalling or other unusual activities. If anomalies are detected, we promptly contact the customer for clarification. If concerns are not resolved satisfactorily, we may temporarily suspend the service.

Traceback Compliance

Emerald Telecom Inc responds swiftly to all traceback requests from industry partners. Each request initiates a thorough 30-day review of the originating customer's call records, followed by direct communication with the customer to address any irregularities. If the customer's response is unsatisfactory within 72 hours, we will provisionally suspend their service. Should there be three unresolved tracebacks within a 90-day period, we will terminate the account unless the traffic is confirmed to be legal and compliant.

STIR-SHAKEN Implementation Status

At present, Emerald Telecom Inc does not possess a Service Provider Code token for STIR/SHAKEN implementation and operates under a temporary extension. We acquire numbers through an upstream wholesale provider as we do not have direct access to number resources.

Customer Vetting Practices

We utilize best practices to verify the identity of all voice service subscribers. This includes confirming the physical location, contact details, state or country of incorporation, federal tax ID, and the nature of the business. For higher-risk commercial customers, we may conduct additional reviews such as background checks and site visits. Our service agreements and acceptable use policies prohibit the use of our services for illegal robocalls, allowing us to suspend or terminate services for violations.

Telephone Number Validation Practices

We ensure that customers have the right to use their telephone numbers through verification processes that confirm calls originate from numbers managed by or obtained through Emerald Telecom Inc. For single line subscribers, calls are only accepted from assigned numbers. For multi-line systems, we screen calls to ensure they match the assigned numbers.

Ongoing Robocall Mitigation Practices

Emerald Telecom Inc continually monitors network usage and scrutinizes call detail records (CDRs) to identify suspicious call activity and patterns that suggest illegal robocalling. When such activity is detected, we launch traceback investigations, verify Caller ID numbers, and ensure the Caller ID name aligns with the customer's information. Actions may include terminating the customer's ability to originate calls and notifying law enforcement if necessary. We pay special attention to high call volumes, short duration calls, sequential dialling patterns, calls to numbers on the do-not-call registry or invalid numbers, and calls to unassigned NPA-NXXs.

Responsibilities

- **Compliance Department:** This department is responsible for verifying customer accounts, authorizing access to services, and monitoring account activity to ensure compliance with applicable laws and this mitigation plan.
- **Technical Department:** This team monitors systems for any abnormal activity that could indicate illegal robocalling.

Conclusion

Emerald Telecom Inc is dedicated to combating illegal robocalls and ensuring the security and reliability of our telecommunications services. Our Robocall Mitigation Plan underscores our commitment to regulatory compliance, consumer protection, and maintaining a trusted telecommunications ecosystem.