



## **Robocall Mitigation Plan**

Stellarc Communications is a VoIP service provider providing fewer than 100,000 end users and has fully implemented STIR/SHAKEN.

### **1. Measures to Prevent Illegal Traffic.**

- a. Stellarc Communications will only contract with "upstream" providers that have deployed a robust and complete STIR/SHAKEN service for all calls.
- b. Stellarc Communications records all metadata allowing searches for unusual traffic patterns.
- c. Stellarc Communications "end users" are not allowed to modify the CID (Caller Identification). This measure prevents the end user from "spoofing" their calls.
- d. Stellarc Communications will only use TNs that are registered to our upstream providers that have an active and complete functioning STIR/SHAKEN plan in place.
- e. All unsuccessful calls are logged and notifications sent via email of the date, time, calling party, the phone number of the individual called, and the state of the call. A high number of "Unallocated" number calls would suggest that the end user is possibly engaging in some form of Robo Calls. In the event that an investigation determines that the end user has been engaged in illegal activities, their account will be suspended pending mitigation procedures.
- f. Stellarc Communications structures its VoIP network to only allow IP address from our customers and upstream carriers. We are currently blocking over 900 million specific IP address and all of our equipment is addressed privately behind multiple firewalls.
- g. Stellarc Communications provides VoIP telephone services to "end users" only and does not sell to "wholesale" services.
- h. Stellarc Communications will limit the device registration to the number of extensions in their plan. Additionally, SIP credentials are not shared with the end user preventing them from registration an unauthorized device.
- i. Stellarc Communications follows the "Knowing our Customer" best practice. Call Center access is only provided to customers that have been thoroughly screened to prevent illegal Robo Calls.

### **2. Trace Back Requests.**

- a. Stellarc Communications keeps detailed call records of all inbound and outbound calls and is fully committed to respond to all "trace back" requests from any authorized legal authority having jurisdiction.
- b. Stellarc Communications has developed custom programs that "trap" or search for any specific criteria requested by the authorized legal authority and will fully commit to providing this information to the legal authority in a timely manner. Stellarc Communications agrees to fully assist the legal authority in whatever information it needs to conduct the requested investigation.

### **3. Measures Taken if Users Engaged in Illegal Activities.**

- a. In the event that end users are using an authorized call center for illegal Robo Calls, the call center functionally will be removed from their account.
- b. In the event that any end user extension is engaged in illegal Robo Call activity, the entire account will be permanently removed and Stellarc Communications will fully cooperate with legal authorities in the prosecution of such activities to the fullest extent of the law.