

## Total Bridge, INC. Robocall Mitigation Plan

Introduction Total Bridge, INC. ("Total Bridge") is dedicated to maintaining the integrity and security of voice communications over IP (VoIP) services. Total Bridge has fully implemented STIR/SHAKEN authentication across its entire network. This Robocall Mitigation Plan complies fully with 47 CFR § 64.6305 and 47 CFR § 64.6301(a)(1) and (2).

### **Robocall Mitigation Strategy**

1.1 Complete STIR/SHAKEN Implementation Total Bridge has fully implemented STIR/SHAKEN authentication on all calls originating from its network using Total Bridge's own certificates, ensuring complete compliance with regulatory requirements.

1.2 Additional Robocall Mitigation Measures Beyond STIR/SHAKEN implementation, Total Bridge employs additional robocall mitigation strategies: - Fraud Detection: Behavioral analytics to identify and prevent robocalls and spam. - Caller ID Name Service: Verification and accurate representation of caller identification. - Call Blocking: Immediate and compliant blocking of fraudulent and illegal calls. - Business Number Verification: Safeguarding legitimate business communications.

1.3 Know Your Customer (KYC) - Relationship Management: Total Bridge closely manages client relationships, primarily small businesses with limited high-volume call traffic. - Managed PBX Platforms: Total Bridge provides managed PBX services, ensuring direct access to customer logs and usage reports for monitoring and detection.

1.4 Customer Screening for Large Volume Calls Total Bridge actively screens all high-volume calling requests: - No deployment of high-volume calling to unverified entities. - Verification required for business justification of high-volume calling. - Mandatory agreement to Total Bridge's abuse terms by all customers. - Ongoing face-to-face contact with clients.

1.5 Monitoring Calling Levels - Usage Monitoring: Regular monitoring and analysis of customer call patterns. - Threshold Enforcement: Investigation and action on unusual usage patterns.

### **Detection and Response**

2.1 Detection Mechanisms - Signature-Based Detection: Identifying known robocall signatures. - Behavioral Analysis: Algorithms for detecting anomalous calling patterns.

2.2 Response Protocols - Immediate blocking of detected suspicious calls. - Prompt reporting of robocall incidents to authorities and stakeholders. - Direct notification and guidance to affected customers.

2.3 Traceback Cooperation - Full cooperation with FCC, law enforcement, and Industry Traceback Group (ITG). - Commitment to respond to traceback requests fully within 24 hours.

## **Compliance and Reporting**

3.1 Regulatory Compliance - Full compliance with FCC robocall mitigation regulations. - Alignment with industry best practices.

3.2 Reporting Obligations - Regular reporting of mitigation activities to the FCC. - Comprehensive internal record-keeping for audit and review.

## **Conclusion**

Total Bridge, INC. reaffirms its commitment to mitigating robocalls through comprehensive STIR/SHAKEN implementation and robust mitigation measures. This ensures compliance with regulatory standards and delivers secure, reliable VoIP services.