

Robocall Mitigation Program (RMP) Description

Company Name: Infinitel LLC,

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I. Overview of Mitigation Strategies

Infinitel, is committed to mitigating illegal robocalls and has implemented a comprehensive Robocall Mitigation Program (RMP) that includes the following strategies:

1. Implementation of STIR/SHAKEN Framework:

- Status: Infinitel will implement the STIR/SHAKEN caller ID authentication framework across IP portions of its network.
- Details: All calls originating from our network are authenticated using STIR/SHAKEN, ensuring that caller ID information is verified before calls are completed.

2. Call Analytics and Blocking:

- System: Infinitel employs call analytics to analyse call patterns and identifies potential illegal robocalls based on various criteria, including call volume, call duration, and geographic patterns.
- Blocking: Identified illegal robocalls are blocked. We maintain a dynamic blocking list that is continuously updated based on real-time data and industry best practices.

3. Know-Your-Customer (KYC) Procedures:

- New Customers: Infinitel conducts thorough vetting of all new customers. This includes verifying the identity and business purpose of each customer, as well as reviewing their historical call patterns if they have previously used another provider.
- Existing Customers: We perform regular audits of existing customers to ensure compliance with our terms of service. Any suspicious activity is investigated, and appropriate action is taken, including terminating service if necessary.

4. Customer Education and Support:

- Education: We provide our customers with educational resources about the dangers of illegal robocalls and best practices for avoiding them. This

includes tips on recognizing spoofed numbers and reporting suspicious calls.

- Support: Our customer support team is trained to handle robocall-related inquiries and provides assistance to customers who believe they have received illegal robocalls.

5. Traceback and Cooperation:

- Traceback Requests: Infinitel responds promptly to all traceback requests. We cooperate fully with the FCC, law enforcement, and other industry bodies in identifying and mitigating sources of illegal robocalls.
- Documentation: We maintain detailed records of all traceback requests and our responses, ensuring full accountability and transparency.

II. Specific Measures and Technologies Implemented

1. Caller ID Authentication:

- Technology: STIR/SHAKEN implementation.
- Coverage: 100% of IP-based calls.

2. Customer Vetting:

- New Customers: Comprehensive identity verification, business purpose assessment, and historical call pattern review.
- Existing Customers: Regular audits and monitoring of call activity.

3. Blocking Procedures:

- Dynamic List: Continuously updated blocking list based on real-time data.
- Criteria: High-volume calling patterns, short-duration calls, and known robocallers.

III. Compliance and Reporting

1. Regulatory Compliance:

- Infinitel ensures compliance with all FCC regulations regarding robocall mitigation. Our RMP is designed to meet or exceed the requirements set forth by the FCC.

2. Reporting and Documentation:

- All records related to our robocall mitigation activities are maintained for a minimum of two years and are available for audit upon request.

IV. Commitment to Continuous Improvement

Infiniteitel is dedicated to continuously improving our Robocall Mitigation Program. We regularly review and update our practices based on new technologies, industry standards, and regulatory requirements. Our goal is to provide the highest level of protection for our customers against illegal robocalls.

Certification: I, Marcus Sheeran, Director of Infiniteitel LLC, certify under penalty of perjury that the above statements are true and correct to the best of my knowledge, information, and belief.

Signature: Marcus Sheeran
Director
Infiniteitel LLC
Date: 26 / July / 2024
