

Robocalling Mitigation Plan

Effective Date: 08/01/2024

Next Review Date: 08/01/2025

Purpose

The purpose of this plan is to outline the procedures and practices implemented by Image Telephone LLC to mitigate and combat illegal robocalling. This plan ensures that Image Telephone LLC complies with federal regulations, including the Federal Communications Commission (FCC) requirements, and maintains the integrity of its communication network by preventing illegal robocalls.

Scope

This plan applies to all services provided by Image Telephone LLC, including voice services, and covers all customers, affiliates, and contractors engaged in transmitting voice communications through Image Telephone LLC's network. It addresses customer vetting, telephone number validation, and ongoing monitoring to identify and block illegal robocalls.

Policy Statement

Image Telephone LLC is committed to preventing illegal robocalling activities on its network. This plan includes robust customer vetting procedures, telephone number validation processes, and continuous monitoring to detect, mitigate, and block illegal robocalls while ensuring that legitimate calls are not impacted.

1. Customer Vetting Procedures

1.1. Customer Registration and Onboarding

- All new customers are required to undergo a thorough vetting process before being granted access to Image Telephone LLC's services.
- The vetting process includes identity verification, validation of business registration information, and review of intended use cases for telephony services.
- Customers must sign a service agreement that includes a strict prohibition on the use of Image Telephone LLC's services for illegal robocalling and outlines the penalties for violations.

1.2. Enhanced Scrutiny for High-Risk Customers

- Customers who intend to use high volumes of outbound calls or who are in industries known for higher risks of robocalling (e.g., telemarketing) will undergo enhanced scrutiny.
- These customers must provide additional documentation, including a detailed description of call practices, opt-in procedures for call recipients, and compliance with federal regulations (e.g., Telephone Consumer Protection Act, TCPA).

1.3. Ongoing Customer Monitoring

- Image Telephone LLC monitors customers' usage patterns and call volumes regularly to detect any suspicious activities indicative of illegal robocalling.
 - High-risk customers are subject to periodic audits to ensure compliance with the company's robocalling mitigation policies.
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2. Telephone Number Validation

2.1. Number Assignment and Validation

- Image Telephone LLC employs strict validation processes when assigning telephone numbers to customers.
- Before assigning numbers, the company ensures that the numbers are valid, have not been previously used for illegal robocalling, and are sourced from authorized pools of numbers.

2.2. STIR/SHAKEN Implementation

- Image Telephone LLC has implemented the **STIR/SHAKEN** (Secure Telephone Identity Revisited/Signature-based Handling of Asserted Information Using toKENs) framework to validate the authenticity of caller ID information.
- All outbound calls are authenticated and verified through the STIR/SHAKEN protocol, preventing spoofed numbers from being used to originate illegal robocalls on the network.

2.3. Regular Number Audits

- Image Telephone LLC conducts regular audits of the telephone numbers in use to ensure that they are being used for legitimate purposes and are compliant with the robocalling mitigation standards.
 - Numbers found to be associated with illegal activities are immediately revoked, and appropriate legal and regulatory action is taken.
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3. Illegal Robocall Detection and Blocking

3.1. Call Analytics and Monitoring

- Image Telephone LLC utilizes advanced call analytics tools to monitor call patterns and detect anomalous activities indicative of illegal robocalling.
- The company analyzes factors such as call duration, frequency, and recipient complaint patterns to identify potential illegal robocall campaigns.

3.2. Real-Time Blocking of Suspected Illegal Robocalls

- Once illegal robocalling activities are identified, Image Telephone LLC employs real-time call blocking technologies to stop these calls from reaching recipients.
- Calls identified as originating from untrusted or spoofed sources are automatically blocked from traversing the network.

3.3. Collaboration with Industry Partners and Government Agencies

- Image Telephone LLC collaborates with industry partners and government agencies, including the FCC, to share information about known robocallers and blocklists.
 - The company participates in robocalling mitigation initiatives and complies with all federal mandates regarding illegal robocall prevention.
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4. Customer and Public Education

4.1. Customer Awareness Programs

- Image Telephone LLC provides educational materials to customers regarding the risks of illegal robocalling and their obligations under the law.
- Customers are informed of best practices for staying compliant, including obtaining proper consent from call recipients and maintaining accurate records of such consents.

4.2. Public Reporting Mechanisms

- Image Telephone LLC offers a mechanism for the public to report suspected illegal robocalls originating from its network.
 - Reports are investigated promptly, and appropriate measures are taken to prevent further illegal activities.
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5. Enforcement and Penalties

5.1. Policy Violations

- Customers found to be engaging in illegal robocalling activities will face immediate suspension or termination of services.
- Image Telephone LLC will cooperate with law enforcement and regulatory agencies in prosecuting those who engage in illegal robocalling.

5.2. Financial Penalties

- Customers involved in illegal robocalling may be subject to financial penalties in accordance with the service agreement and applicable laws.
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6. Review and Auditing

6.1. Regular Audits

- Image Telephone LLC will conduct regular audits of its robocalling mitigation efforts, customer vetting procedures, and telephone number validation processes to ensure ongoing effectiveness.

6.2. Plan Review

- This Robocalling Mitigation Plan will be reviewed and updated at least annually or as required by changes in regulations or industry best practices.
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Approved by:

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VP

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