



Robocall Mitigation Program Description for Blue Telecoms

Company Name: Blue Telecoms

UK's Ofcom Registration Number: PEC# 00000816

UK's ICO Registration Number: ZA205648

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Introduction:

Direct Market Solutions Limited (trading as Blue Telecoms) is a UK-based telecommunications provider registered with UK regulations - Ofcom and the ICO. We provide services to customers with a presence in both the UK and the USA. To comply with the FCC's requirements under the TRACED Act, we have developed and implemented a Robocall Mitigation Program (RMP). This program outlines the steps we take to prevent the origination of illegal robocalls on our network.

1. Mitigation Strategy Overview

Blue Telecoms' Robocall Mitigation Program includes the following key components:

1.1 Monitoring of Call Metrics

We actively monitor the following call metrics to detect and mitigate illegal robocalls:

- **Average Call Duration (ACD):** We track the average duration of calls to identify patterns indicative of robocalls. Calls with consistently short durations are flagged for further review.
- **Answer-Seizure Ratio (ASR):** We monitor the ASR to detect abnormally low ratios that may suggest the presence of robocalls. Low ASR values are investigated as they could indicate high volumes of calls not being answered, which is often associated with robocalls.

1.2 Network CLI and Presentation CLI Monitoring

We ensure that all calls originating from our network carry a valid and correctly formatted Caller Line Identification (CLI) and Presentation CLI. Our processes include:

- **Validation of Network CLI:** We verify that the CLI presented on all outbound calls aligns with the assigned numbers within our network and complies with UK and international standards.
- **Validation of Presentation CLI:** We ensure that the Presentation CLI (the number displayed to the recipient) is accurate and has been authorized for use by the customer. We prevent customers from using CLI numbers that they do not have a legitimate right to use.

1.3 Customer Presence Verification in the USA

For customers making calls to the USA, Blue Telecoms requires proof of a valid business presence in the USA. This verification process includes:



- **Business Registration:** Customers must provide documentation proving their legal business presence in the USA, such as a valid EIN (Employer Identification Number) or state business registration.
- **Use of Local Numbers:** We encourage customers to use local USA numbers for outbound calls. If a customer does not have a local USA number, we provide guidance on obtaining one legally.

2. Compliance Monitoring and Reporting

Blue Telecoms is committed to maintaining compliance with FCC regulations and industry best practices. Our compliance measures include:

2.1 Regular Audits

We conduct regular audits of our call records and CLI usage to ensure compliance with our Robocall Mitigation Program. Any discrepancies or anomalies are investigated promptly.

2.2 Incident Response

In the event that illegal robocalls are detected originating from our network, we have a defined incident response plan. This includes:

- Immediate blocking of suspicious call traffic.
- Notification of the affected customer and relevant authorities.
- A thorough investigation to determine the source of the illegal calls.
- Implementation of corrective actions to prevent recurrence.

2.3 Reporting to the FCC

Blue Telecoms is committed to cooperating fully with the FCC and other relevant authorities. We will provide regular reports on our Robocall Mitigation Program and any incidents of illegal robocalling as required.

3. Customer Education and Support

We educate our customers on the importance of complying with robocall mitigation measures. This includes:

- Providing guidelines on lawful calling practices.
- Offering technical support for implementing valid CLI.
- Assisting customers in obtaining a legal presence in the USA, if necessary.

4. Conclusion

Blue Telecoms is fully committed to preventing the origination of illegal robocalls on our network. Our Robocall Mitigation Program is designed to meet the requirements set forth by the FCC and to protect consumers from unwanted and illegal robocalls. We will continue to monitor, assess, and improve our mitigation strategies to ensure ongoing compliance and effectiveness.