

Document: Robocall Mitigation Plan for SIP Trunking and Termination Services

Purpose: This document outlines the necessary actions to be implemented by our company to comply with robocall mitigation regulations as a service provider offering SIP trunking and termination services. Our objective is to protect our clients from illegal robocalls while ensuring seamless internal and external communication across their branches. We provide US local phone numbers for clients to communicate with their own customers, vendors, and partners.

1. Overview of Services

We provide SIP trunking and termination services for clients to facilitate:

- **Internal communication:** Phone systems for communication between employees and branches.
- **External communication:** Local US phone numbers to allow clients to communicate with customers, partners, and vendors.

2. Regulatory Requirements

The Federal Communications Commission (FCC) mandates that all voice service providers, including those offering SIP trunking, must implement robocall mitigation practices to prevent illegal robocalls. These practices are aimed at detecting, preventing, and mitigating robocalls that involve fraudulent caller ID information or otherwise violate the law.

3. Key Actions for Robocall Mitigation

3.1. STIR/SHAKEN Implementation

- **STIR/SHAKEN Overview:** To comply with FCC regulations, we will rely on the STIR/SHAKEN (Secure Telephone Identity Revisited/Signature-based Handling of Asserted Information Using toKENs) framework for authenticating caller ID information. This protocol is essential to verify the legitimacy of the calling party and prevent caller ID spoofing, which is often used in robocall scams.
- **Voice Provider Dependency:** We rely on the availability and implementation of STIR/SHAKEN by our upstream voice providers. These providers are responsible for ensuring that calls passed through their network comply with FCC standards for caller ID authentication.
- **Action Items:**
 - Ensure all outgoing calls passing through our network are authenticated via STIR/SHAKEN, leveraging our voice providers' implementation.
 - Collaborate closely with voice providers to verify that calls adhere to FCC regulations and are signed with valid caller IDs.
 - Monitor updates from voice providers to ensure continued compliance and system availability for call authentication.

3.2. Robocall Mitigation Database Registration

- **FCC Database Compliance:** We will register in the FCC's Robocall Mitigation Database, as required for all voice service providers, to confirm compliance with robocall mitigation rules.
- **Action Items:**
 - Complete registration in the FCC's Robocall Mitigation Database.

- Provide a detailed description of our robocall mitigation practices in the registry.

3.3. Call Authentication and Verification

- **Caller ID Verification:** We will implement mechanisms to verify that outgoing calls through our SIP trunking services use accurate and legitimate caller ID information, reducing the chances of spoofed calls.
- **Action Items:**
 - Leverage STIR/SHAKEN protocols to authenticate caller IDs.
 - Ensure real-time monitoring of the call flow to identify and address any caller ID anomalies.

3.4. Traffic Monitoring and Anomaly Detection

- **Call Traffic Monitoring:** Monitoring call traffic is essential to identify irregular patterns that might indicate robocall campaigns. Anomalous call volumes can trigger deeper investigations into the origin of the calls.
- **Action Items:**
 - Set up traffic monitoring systems to detect unusual or high-volume call patterns.
 - Implement escalation protocols to suspend services for clients found engaging in illegal robocall activity.

3.5. Blocking Suspicious Traffic

- **Call Blocking Practices:** We will block suspicious calls that fail authentication or exhibit signs of being part of robocall schemes.
- **Action Items:**
 - Deploy systems to block calls that fail STIR/SHAKEN authentication or originate from unverified sources.
 - Work with our voice providers to enforce strict filtering rules for incoming and outgoing calls.

3.6. Client Accountability and Education

- **Client Responsibility:** We will work with clients to educate them on how to prevent illegal robocalls from originating through their phone systems.
- **Action Items:**
 - Provide guidelines to clients on securing their phone systems and ensuring that only legitimate caller IDs are used.
 - Offer training to clients about robocall risks and their role in maintaining compliance.

4. Reporting and Feedback Mechanisms

We will create reporting channels for clients and call recipients to report suspected illegal robocalls. Our team will promptly investigate these reports and take corrective action if necessary.

- **Action Items:**
 - Set up a robust reporting process for illegal robocall complaints.
 - Respond promptly to all reports, adjusting mitigation practices as needed.

5. Ongoing Compliance and Updates

We are committed to maintaining ongoing compliance with FCC regulations. As regulations evolve, we will review and update our robocall mitigation practices, including any enhancements to the STIR/SHAKEN protocol implemented by our voice providers.

- **Action Items:**

- Conduct periodic reviews of our robocall mitigation practices.
- Stay up-to-date with changes in FCC rules and ensure our systems comply with the latest regulations.

Conclusion: We rely on our voice providers' implementation of the STIR/SHAKEN protocol to meet FCC requirements for robocall mitigation. By leveraging these technologies and continuously monitoring our network, we protect our clients from illegal robocalls while ensuring compliance with regulatory standards. We are committed to delivering secure and compliant SIP trunking and termination services to help our clients communicate effectively and safely.

If you have any questions regarding our robocall mitigation efforts, please contact our support team.