

Robocall Mitigation Program Description

In compliance with the requirements of 47 CFR § 64.6305(d)(ii)-(iii), our Robocall Mitigation Program has been designed to address and prevent the origination of illegal robocalls on our network, despite not being directly obligated to adhere to STIR/SHAKEN compliance. Our strategy relies on leveraging the protections of the mainstream networks we utilize.

Our approach includes the following key elements:

Network Dependency: As we rely on mainstream upstream carriers that are STIR/SHAKEN compliant, we inherit the protections they provide, ensuring that all calls routed through our systems are screened by these compliant networks. This strategy minimizes the risk of originating illegal robocalls through our services.

Call Monitoring: We actively monitor call patterns on our network to detect abnormal or potentially fraudulent activity. Traffic that exhibits suspicious behavior, such as unusually high call volumes or abnormal patterns, is flagged for further investigation.

Customer Vetting: All customers and traffic sources are thoroughly vetted before onboarding. This includes verifying customer identities and assessing their intended use of our services to prevent malicious actors from exploiting our platform for illegal robocalls.

Complaint and Incident Response: We have a process in place for promptly responding to complaints about suspected robocalls or fraudulent activity. If any such reports are received, we take immediate action to investigate and resolve the issue, including suspending or terminating service for any identified bad actors.

Collaboration with Upstream Providers: We work closely with our upstream carriers to stay updated on best practices and share information about potential robocall threats. This collaborative approach helps ensure that our traffic remains clean and in compliance with broader industry efforts.

Compliance with FCC and Industry Standards: While we do not have a direct obligation to implement STIR/SHAKEN on our platform, we are fully committed to following all applicable FCC guidelines and participating in industry-wide initiatives aimed at curbing illegal robocalls.

Through these measures, we aim to mitigate the risk of illegal robocall traffic on our network and contribute to the broader effort of preventing fraudulent activity in the telecom ecosystem.