



As a switchless reseller of telecommunications services, 180 PROS llc does not have the ability to implement STIR/SHAKEN procedures.

Robocall Mitigation Strategy

Know Your Customer

180 PROS llc is engaged with each customer they work with, and all customers are screened for appropriateness. All 180 PROS llc customers have access to the 180 PROS llc portal for call screening and the ability to block calls via the DID or Caller ID. 180 PROS llc also screens CDR's for suspicious behavior and call patterns that could relate to robocalling. Robocalling is in direct violation of 180 PROS's terms of service and 180 PROS llc reserves the right to terminate service to any customer for violating those terms of service which includes unlawful robocalls.

Traceback

180 PROS llc responds to all traceback and requests from law enforcement, the FCC, and the registered traceback consortium and will cooperate with those entities into investigating and stopping any bad actors that use the 180 PROS llc service to originate calls.

Stir/Shaken

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

Our team utilizes mitigation software as well as tracking software that monitors our voice traffic in real time to ensure that no origination of robocalls come from our network.

- * Continuously monitoring outbound calling patterns and volume to confirm that no malicious activity is occurring.
- * Customers are subject to a rate-limitation on the domain, and voice switch level.
- * All numbers are pass through carriers such as Bandwidth, Flowroute, and Vitelity. These carriers have full STIR/SHAKEN deployments, as well as robocall mitigation programs and policies that will alert us if suspicious activity has been detected from our account.
- * Caller IDS, DIDs, and CNAMEs are verified with the customer to prevent any spoofing behavior.
- * Our system will inform us if a call has originated with an invalid or unallocated DID, where we will investigate to determine if the call was legitimate, and if not, we will warn and stop the customers service as appropriate