

#Robocall Mitigation Program Description

.1 ##Company Information

AdPro

Cloud PBX and Voice Service Provider

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.2 ##Service Description

Our company provides cloud-based PBX and voice communication services to business customers. We currently serve fewer than 100,000 subscriber lines, qualifying us as a small voice service provider under 47 CFR § 64.6304(d).

.3 ##Robocall Mitigation Procedures

3.1 ###Customer Verification

- Comprehensive Know Your Customer (KYC) procedures for all new accounts
- Collection and verification of business registration documents
- Validation of contact information and physical address
- Regular review and updates of customer information

3.2 ###Traffic Monitoring

- Real-time monitoring of call patterns
- Automated detection of suspicious calling behavior including:

- Unusual call volume spikes
- High-volume short-duration calls
- Unusual geographic patterns
- Abnormal calling rates
- Automated alerts for suspicious activity
- Regular review of call traffic patterns

3.3 ####Technical Controls

- Implementation of call rate limiting
- Restrictions on concurrent calls based on customer profile
- Blocking of known fraudulent number patterns
- Regular updates to security measures and control systems

.4 ##Response Procedures

4.1 ####Traceback Request Response

- Dedicated team for handling traceback requests
- 24/7 -availability for urgent requests
- Commitment to respond within 24 hours
- Maintenance of detailed call records for investigation support
- Established procedures for evidence preservation

4.2 ####Violation Response

- Immediate investigation of reported violations
- Authority to suspend services for confirmed violations
- Clear procedures for account termination
- Documentation of all enforcement actions
- Regular review and updates of response procedures

.5 ##Compliance Program

5.1 ###Staff Training

- Regular training on robocall mitigation procedures
- Updates on latest fraud patterns and prevention techniques
- Documentation of all training activities
- Periodic review and updates of training materials

5.2 ###Record Keeping

- Maintenance of detailed call records
- Documentation of all mitigation activities
- Regular audits of compliance procedures
- Secure storage of all relevant documentation

.6 ##Ongoing Improvement

6.1 ###Program Review

- Quarterly review of mitigation procedures
- Regular updates based on industry best practices
- Integration of lessons learned from incidents
- Continuous improvement of detection and prevention measures

.7 ##Inter-Agency Cooperation

We commit to:

- Full cooperation with FCC investigations
- Prompt response to law enforcement requests

- Active participation in industry anti-fraud efforts
- Regular updates to our procedures based on regulatory guidance

.8 ##STIR/SHAKEN Implementation Plan

While currently exempt from immediate STIR/SHAKEN implementation as a small provider under 47 CFR § 64.6304(d), we are actively planning for future implementation through:

- Evaluation of technical requirements
- Budget allocation for necessary equipment
- Staff training preparation
- Timeline development for full implementation

##Contact Information

For Traceback Requests and Regulatory Matters :

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Available 24/7 for urgent matters