

Robocall Mitigation Program Description for initova GmbH

1. Introduction

initova GmbH is committed to protecting its customers and the integrity of the telecommunications network from illegal robocalls. This Robocall Mitigation Program outlines the measures initova GmbH takes to prevent, detect, and respond to illegal robocalling activity.

2. Robocall Mitigation Practices

initova GmbH employs a multi-layered approach to mitigate robocalls, including:

- **Customer Education and Awareness:**
 - Providing customers with information and resources on how to identify and report robocalls.
 - Educating customers about call blocking tools and best practices for managing unwanted calls.
- **Network Monitoring and Analysis:**
 - Implementing systems to monitor network traffic for patterns and anomalies indicative of robocalling activity.
 - Analyzing call data records (CDRs) to identify suspicious calling behaviors, such as high call volumes, short call durations, and unusual calling patterns.
- **Call Blocking and Filtering:**
 - Utilizing call blocking technologies to prevent known robocall numbers from reaching customers.
 - Implementing filters to identify and block calls with spoofed caller ID information.
- **Traceback and Investigation:**
 - Responding promptly to traceback requests from law enforcement, the FCC, and the industry traceback consortium.
 - Cooperating fully with investigations into illegal robocalling activities.
 - Taking appropriate action against customers found to be engaging in illegal robocalling, which may include suspension or termination of service.
- **Customer Vetting:**
 - Implementing procedures to verify the identity and legitimacy of new customers.
 - Conducting due diligence to ensure that customers are not using initova GmbH's services for illegal purposes.
- **Telephone Number Validation:**
 - Taking steps to confirm that customers have the right to use the telephone numbers they are assigning to their services.
 - Considering the use of third-party validation services to enhance number validation processes.

3. STIR/SHAKEN Implementation

- **Option 1: Complete STIR/SHAKEN Implementation.** initova GmbH has fully implemented the STIR/SHAKEN authentication framework across its entire network. All calls originating on initova GmbH's network are authenticated and comply with 47 CFR § 64.6301(a)(1) and (2).

4. Ongoing Commitment

initova GmbH is committed to continuously improving its Robocall Mitigation Program. This includes staying informed about industry best practices, evolving technologies, and regulatory requirements. initova GmbH will regularly review and update this program to ensure its effectiveness in combating illegal robocalls.

5. Contact Information

For any inquiries or to report suspected illegal robocalling activity, please contact initova GmbH at:

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