

Callture Robocall Mitigation Policy

Date	Voice Provider	Version
February 11, 2025	Callture inc	Initial Version

I. Introduction

In accordance with the FCC's requirements under the TRACED Act, all voice service providers are required to certify their status for compliance with STIR/SHAKEN in the Robocall Mitigation Database. Foreign service providers must implement a Robocall Mitigation Plan and certify its implementation to the FCC. This plan must detail the reasonable steps taken to avoid originating illegal robocalls, demonstrate a commitment to respond to traceback requests, and cooperate with investigating and stopping illegal robocalls. The completed Robocall Mitigation Plan must be filed in the Robocall Mitigation Database.

This Robocall Mitigation Plan is submitted on behalf of Callture. Callture is a small foreign voice service provider with SIP services in its network. Callture is committed to complying with all applicable regulations and is actively working to mitigate illegal robocall traffic on its network.

II. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

Callture has implemented the following measures to prevent the origination of illegal robocall traffic:

- **Traffic Analysis and Monitoring:** Callture will continuously monitor outbound call traffic for suspicious patterns, including:
 - High call volumes from specific numbers within short periods.
 - Calls to large numbers of unique numbers.
 - Calls with unusually short durations.
 - Patterns indicative of spoofed caller IDs.
- **Content Analysis:** Where technically feasible and legally permissible, Callture will analyze call content, looking for keywords or phrases commonly associated with robocalls (e.g., "free," "guaranteed," "limited time offer"). This will be done with careful consideration of privacy regulations.
- **Call Blocking and Filtering:** Callture will continue to offer and enhance call blocking and filtering services to empower customers to manage unwanted calls. This includes both manual blocking and automated spam filtering.
- **Know Your Customer (KYC) Procedures:** Callture will implement KYC procedures during customer onboarding to verify the legitimacy of businesses using our services. This includes verifying business identities and contact information. This will be done both via direct contact and confirmation with end users as well the use of third party

identity verification services where necessary.

- **High-Volume Call Path Screening:** Callture will implement a screening process for new customers requesting service at or above high-volume calling thresholds. This will include verification of business tax ID information, verification of the nature of the business
- **Terms of Service Enforcement:** Callture's Terms of Service/Sales Agreement explicitly prohibits the use of our services for illegal robocalling. We will take appropriate action, including service suspension or termination, against customers found to be in violation.
- **Collaboration with Industry Partners:** Callture will actively participate in industry initiatives and working groups focused on combating robocalls, sharing information and best practices.

III. Commitment to Respond to Traceback Requests

- **Designated Contact:** Zuly Ortegon, DID and Provider Management, will serve as the primary point of contact for all traceback requests. We have also updated Traceback group with the contact email providers@callture.com which includes this designated contact as well as other key members within our team to facilitate expediency.

Zuly Ortegon

647-258-5271

zuly.ortegon@callture.com

- **Timely Response:** Callture is committed to responding to all legitimate traceback requests from the FCC, law enforcement, and the industry traceback consortium within the required timeframe.
- **Record Keeping:** Callture will maintain accurate and detailed call detail records (CDRs) to facilitate efficient traceback investigations.

IV. Cooperation with Investigations

- **Full Cooperation:** Callture will fully cooperate with the FCC, law enforcement, and the industry traceback consortium in the investigation and prosecution of illegal robocallers using our network.
- **Information Sharing:** Callture will share relevant information, including customer data (subject to legal restrictions and privacy policies), call records, and technical expertise, to assist in investigations.

V. Ongoing Review and Improvement

This program will be reviewed and updated regularly to ensure its effectiveness and to adapt to evolving robocall tactics. Calltune will monitor industry best practices, regulatory changes, and customer feedback to identify areas for improvement.

VI. STIR/SHAKEN Implementation

As a small foreign provider, Calltune has not yet implemented the STIR/SHAKEN authentication framework. We are closely monitoring the evolving regulatory landscape and industry best practices related to STIR/SHAKEN. If and when it becomes a requirement for foreign providers of our size, we will promptly implement STIR/SHAKEN across our network to align with those standards.

VII. Reporting

This robocall mitigation program will be documented and included in our certification filing with the FCC, as required by 47 CFR § 64.6305(b).