

# Robocall Mitigation Plan

## Company Information

- **Company Name:** Opus1 Development Studio, dba opus1.io
  - **FCC Registration Number (FRN):** 0036754075
  - **Address:** 4131 El camino real #103, Palo Alto, CA
  - **Point of Contact:** Samuel Lellouche
  - **Email:** sam@opus1.io
  - **Phone:** 510-396-8935
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## 1. STIR/SHAKEN Compliance

- **Our company does not directly implement STIR/SHAKEN.**
  - We utilize **Bandwidth**, a fully STIR/SHAKEN-compliant provider, for all outbound and inbound calls.
  - **Bandwidth applies STIR/SHAKEN authentication** for calls originating from our platform, ensuring compliance with **47 CFR § 64.6301(a)**.
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## 2. Measures to Prevent and Mitigate Illegal Robocalls

To prevent unauthorized robocalls, we implement the following mitigation strategies:

### A. Manual Call Placement Policy (No Robocalling)

- Our platform **only allows manually placed calls** by users and does not support **automated calling, autodialing, or pre-recorded messages**.
- Because our service does **not enable robocalling**, customers cannot use our platform for mass or automated calling campaigns.

- We explicitly prohibit the use of **third-party automation tools** to trigger calls through our system.

## B. Customer Vetting & Authentication

- We **verify all customers** before assigning phone numbers or allowing outbound calling.
- Customers must provide:
  - **Valid business registration** (EIN or equivalent verification).
  - **Billing information** matching their registration.
  - **Agreement to terms** prohibiting illegal robocalling.

## C. Call Traffic Monitoring

- We **monitor call patterns** to detect suspicious activity:
  - High-volume, short-duration calls.
  - Calls to high-risk destinations.
  - Unusual call patterns deviating from normal customer behavior.
- If **suspicious activity is detected**:
  - We **investigate** the customer's usage.
  - We may **suspend or terminate service** if illegal robocalling is confirmed.
  - We notify **Bandwidth and the appropriate authorities** if necessary.

## D. Caller ID Authentication

- We require customers to use **verified phone numbers** for outbound calls.
- Caller ID information is registered and maintained to prevent **spoofing**.

## E. User Education & Compliance Training

- We provide documentation to customers on **legal calling practices** and explicitly prohibit the use of our platform for illegal robocalls.

- Our Terms of Service include clear policies on **robocall compliance**, and customers must acknowledge and agree to these terms before using our platform.
  - Customers are informed about **STIR/SHAKEN compliance, caller ID best practices, and FCC regulations** to minimize the risk of call blocking.
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### 3. Response to Traceback Requests

- Our company **cooperates fully with traceback requests** from:
    - **FCC**
    - **U.S. law enforcement agencies**
    - **Industry traceback consortiums**
  - Upon receiving a traceback request:
    - We **respond within 1 business day**.
    - We **provide call records** and any relevant information to assist investigations.
    - If a customer is found to be engaging in illegal robocalling, we **terminate their service immediately**.
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### 4. Compliance with FCC Requirements

- We **certify that we have not been prohibited from filing** in the **FCC Robocall Mitigation Database**.
  - We **maintain compliance** with **47 CFR § 64.6305(a)** through active monitoring and customer vetting.
  - Our **employees and support teams are trained** to recognize and prevent illegal robocall activity.
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### 5. Contact for Law Enforcement & Traceback Requests

- **Designated Compliance Officer:** Samuel Lellouche
- **Email:** [compliance@opus1.io](mailto:compliance@opus1.io)

- **Phone:** +1 510-396-8935
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## **Submission & Updates**

- This plan is submitted as part of our **FCC Robocall Mitigation Database filing**.
- It will be **reviewed and updated periodically** to remain compliant with evolving regulations.