

Robocall Mitigation Program Description

1. Program Overview

Our organization is committed to preventing the origination of illegal robocall traffic and ensuring full compliance with the Federal Communications Commission's (FCC) regulations, including 47 CFR § 64.6305(a). This program outlines our policies, procedures, and technical measures to mitigate risks associated with robocall activity and to provide prompt assistance for any traceback requests.

2. Network Description and Scope

Our communications network is strictly limited to internal office operations. All users on our network are fully identified employees, and we do not provide retail or wholesale services. This controlled environment significantly minimizes the risk of unauthorized or spoofed calls, as every call originates from a verified source within our organization.

3. Robocall Mitigation Measures

a. Call Origination Controls

- All calls initiated within our network are subject to internal controls designed to ensure that they adhere to our approved procedures and comply with 47 CFR § 64.6305(a).
- We employ robust access controls and continuous monitoring to prevent unauthorized call origination.
- Anomalous or suspicious call patterns are flagged for further review and prompt investigation.

b. STIR/SHAKEN Implementation

- Given the internal, fully identified nature of our network, our organization has elected not to implement the STIR/SHAKEN authentication framework.
- Under Option 3 (No STIR/SHAKEN Implementation), we maintain that our limited user base negates the need for such a framework, as the risks of caller ID spoofing are inherently minimized.

c. Additional Technical Measures

- Continuous monitoring systems are in place to analyze call traffic and detect any irregularities that might indicate unauthorized or illegal robocall activity.
- Regular system audits and software updates are conducted to ensure the ongoing integrity and security of our communications infrastructure.

4. Traceback and Response Procedures

Our organization is committed to cooperating fully with the FCC, law enforcement agencies, and the industry traceback consortium. The following procedures are enacted upon receipt of a traceback request:

- **Verification:** Confirm the legitimacy of the request and gather all pertinent call data from our internal logs.
- **Investigation:** Initiate an immediate review to trace the call's origin, utilizing our comprehensive system monitoring.
- **Response:** Provide complete and accurate information within 24 hours, in compliance with our commitment under 47 CFR § 64.6305(a).
- **Documentation:** Maintain detailed records of all actions taken in response to traceback requests for audit and compliance purposes.

5. Compliance and Monitoring

- Continuous monitoring of call activity ensures that our mitigation measures are effective and compliant with FCC regulations.
- Regular internal audits are conducted to review the performance of our mitigation program and to identify potential improvements.
- Any detected anomalies are escalated immediately to our compliance team for thorough investigation and corrective action.

6. Implementation Status and Future Plans

- Our organization currently operates under Option 3, which means we have not implemented the STIR/SHAKEN authentication framework given our exclusive use for internal communications.
- We remain committed to maintaining a robust robocall mitigation program and will reassess our implementation strategy should the scope of our network evolve.

7. Certifications and Declarations

We hereby certify that:

- All calls originating from our network are subject to a comprehensive robocall mitigation program compliant with 47 CFR § 64.6305(a).
- No prior certification has been removed by Commission action, and we are not prohibited from filing in the Robocall Mitigation Database by the FCC.
- We commit to responding fully and within 24 hours to all traceback requests and to cooperating with the Commission, law enforcement, and industry traceback consortiums in addressing any illegal robocall activity.

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