

Organization Name: EnrollHere
Plan Effective Date: 3/11/2025
Contact Information:

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1. Executive Summary

This Robocall Mitigation Plan outlines the procedures and policies implemented by EnrollHere to identify, prevent, and manage illegal robocalls. Leveraging Telnyx as our telecommunication platform, this plan ensures compliance with FCC regulations and aims to protect consumers from unwanted or fraudulent calls. This document is submitted to the Robocall Mitigation Database (RMD) as required by the FCC.

2. Introduction

The increasing prevalence of illegal robocalls necessitates a robust mitigation strategy. Our organization is committed to safeguarding consumers by implementing industry best practices and utilizing advanced technology provided by Telnyx to manage both inbound and outbound call traffic.

3. Organization and Telnyx Integration Overview

3.1 Company Background

- **Telecommunications Operations:** Our organization utilizes Telnyx to manage all inbound and outbound call activities. Telnyx's platform provides reliable connectivity, call routing, and real-time analytics which are essential for mitigating robocall risks.

3.2 Telnyx Capabilities

- **Call Routing & Management:** Telnyx's system allows for precise call routing to prevent unauthorized call origination.
- **Real-Time Monitoring:** Continuous monitoring capabilities enable immediate detection of anomalies in call patterns.
- **Scalability:** The platform supports a high volume of call transactions, ensuring robust performance during peak periods.

4. Objectives

- **Compliance:** Ensure full adherence to FCC regulations on robocall mitigation.
 - **Detection & Prevention:** Implement measures to detect and prevent illegal robocalls.
 - **Accountability:** Establish clear roles and responsibilities for managing and reporting incidents.
 - **Transparency:** Maintain accurate records and provide necessary reports to the FCC.
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5. Robocall Mitigation Measures

5.1 Call Origination and Termination Verification

- **Authentication:** Use Telnyx's caller ID authentication mechanisms to verify call origin.
- **Call Path Validation:** Regularly audit call routes to ensure compliance with FCC guidelines.

5.2 Inbound Call Management

- **Screening and Filtering:**
 - Deploy automated filtering to identify and block calls from known fraudulent numbers.
 - Use real-time analytics to monitor call patterns and flag suspicious activity.
- **Caller Consent:** Verify caller consent where required by law.

5.3 Outbound Call Controls

- **Pre-Dial Screening:**
 - Ensure that outbound calls are pre-screened for compliance using Telnyx's API and third-party databases.
 - Integrate with Do Not Call (DNC) registries to block calls to numbers on the list.
- **Call Frequency Limits:** Establish frequency limits to reduce the risk of perceived harassment.

5.4 Monitoring and Analytics

- **Real-Time Monitoring:** Utilize Telnyx's dashboard for continuous real-time monitoring of call activities.
- **Anomaly Detection:** Implement machine learning algorithms and heuristic analysis to detect unusual call volume or patterns indicative of robocalling.

5.5 Incident Response and Escalation Procedures

- **Immediate Action:** Upon detection of a potential robocall incident, suspend the offending call stream.
 - **Investigation:** Conduct an internal review and, if necessary, notify relevant authorities.
 - **Documentation:** Maintain detailed logs of all incidents, including time-stamped call records, action taken, and outcome.
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6. Training and Compliance

- **Staff Training:** Regularly train all relevant personnel on the latest FCC regulations, Telnyx functionalities, and internal policies.
 - **Policy Reviews:** Perform quarterly reviews of the mitigation plan to incorporate new regulatory updates or technological advancements.
 - **Compliance Audits:** Schedule regular internal and third-party audits to ensure ongoing compliance with FCC guidelines.
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7. Reporting and Recordkeeping

- **Documentation:** All call records and incident reports are maintained in a secure, auditable system.
 - **FCC Reporting:** Compile and submit required reports to the FCC, ensuring that the records reflect the implementation and efficacy of the mitigation measures.
 - **Data Retention:** Store call logs and related documentation for a minimum of 1 year in compliance with FCC requirements.
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8. Ongoing Evaluation and Improvement

- **Performance Metrics:** Define key performance indicators (KPIs) to measure the effectiveness of the mitigation strategies.
 - **Feedback Loop:** Establish a process for periodic review and feedback from both internal teams and external stakeholders.
 - **Technology Upgrades:** Stay informed on advancements in call technology and update Telnyx configurations accordingly.
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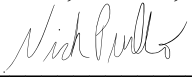
9. Appendices

Appendix A: Glossary

- **RMD:** Robocall Mitigation Database.
- **FCC:** Federal Communications Commission.
- **DNC:** Do Not Call.

Approval and Sign-off:

By signing below, the authorized representative of EnrollHere confirms that this Robocall Mitigation Plan is accurate, current, and compliant with all applicable FCC requirements.

Signature:  _____

Name & Title: Nicholas Pirollo, CTO

Date: 3/11/25