

Robocall Mitigation Program Description
HBSS Connect Corp
Date: April 4, 2025

Company Identification:

1. **Legal Name of Filer:** HBSS , Inc.
 2. **FCC Registration Number (FRN):** 0036793305
 3. **Primary Business Address:** 1075 Westford Street, Suite 304, Lowell, MA 01851
- Primary Contact Information:**
Name: Kathlene Chamberlain
Title: Sr. Executive Assistant
Email: kdc@hbssonline.com
Phone: 978-379-0010

Statement of Commitment

HBSS Connect Corp. ("HBSS") is committed to strict compliance with all applicable federal and state laws and regulations governing the prevention of illegal robocall traffic. In accordance with the requirements set forth by the Federal Communications Commission ("FCC") and consistent with industry's best practices, HBSS has adopted and implemented reasonable measures designed to prevent the origination, transmission, or facilitation of unlawful robocalls on its network, whether directly or indirectly.

Description of Robocall Mitigation Practices @HBSS

(a) **Call Origination Through Bandwidth, Inc.** HBSS Connect Corp ("HBSS") originates all voice calls through Bandwidth, Inc., or another third party registered and authorized voice service provider. HBSS relies on Bandwidth's or third-party vendors network infrastructure for the origination and termination of calls, ensuring compliance with applicable telecommunications regulations and industry best practices. By utilizing Bandwidth's services, HBSS aligns its operations with the highest standards of call authentication and security.

(b) **STIR/SHAKEN Implementation Plan.** HBSS is actively engaged in obtaining the necessary STIR/SHAKEN digital certificate to enhance the authentication of its outbound call traffic. Upon successful acquisition of this certificate, HBSS will provide it to Bandwidth, Inc., which will subsequently implement it for all calls originating from HBSS.

- (i) HBSS has set a target date of June 1, 2025, for the completion of this implementation.
- (ii) The implementation of STIR/SHAKEN will allow calls originating from HBSS to be signed with an appropriate attestation level, thereby increasing transparency and reducing the likelihood of illegal robocalls being associated with HBSS's call traffic.
- (iii) HBSS recognizes the Federal Communications Commission (FCC) requirements and the industry-wide importance of STIR/SHAKEN, and therefore, it is prioritizing this implementation to comply with regulatory obligations and mitigate unlawful call activity.

(c) **Pre-STIR/SHAKEN Robocall Mitigation Measures.** Until full implementation of STIR/SHAKEN, HBSS has adopted the following robocall mitigation measures to prevent the origination of unlawful robocalls:

1. Traffic Monitoring and Anomaly Detection

- (i) HBSS actively monitors its outbound call traffic to identify and investigate irregular calling patterns that may indicate fraudulent or unauthorized activity.
- (ii) Specific indicators of concern include, but are not limited to:
 - (A) Exceptionally high call volumes originating from a single source.
 - (B) A high percentage of short-duration calls, which may indicate an attempt to generate robocalls.
 - (C) Patterns suggesting sequential dialing or auto-dialing, which could be indicative of illegal robocall campaigns.
- (iii) Any such irregularities are subject to immediate internal review and appropriate remedial action, which may include suspending or terminating services for non-compliant users.

2. Consumer Complaint Handling and Resolution

- (i) HBSS has established a formal process for receiving, reviewing, and responding to consumer complaints regarding suspected robocalls originating from its network.
- (ii) Any individual or entity wishing to report a concern may do so by contacting HBSS at kdc@hbssonline.com.
- (iii) All complaints are reviewed by a dedicated internal compliance team, which conducts thorough investigations and takes appropriate corrective actions, such as blocking offending numbers or enhancing monitoring controls.

3. Regulatory Compliance and Legal Obligations

- (i) HBSS is committed to full compliance with all applicable federal and state laws governing telecommunications and robocall prevention, including but not limited to:
 - (A) The Telephone Consumer Protection Act (TCPA) (47 U.S.C. § 227), which restricts unsolicited calls and text messages.
 - (B) The Truth in Caller ID Act (47 U.S.C. § 227(e)), which prohibits the transmission of misleading or inaccurate caller identification information with intent to defraud or cause harm.
 - (C) Applicable FCC regulations and state-specific telemarketing laws, which impose additional restrictions on robocalling and call authentication practices.
- (ii) HBSS ensures that all users of its calling services are made aware of their obligations under these laws and reserves the right to terminate services for any party found to be in violation of such legal requirements.
- (d) **Post-STIR/SHAKEN Robocall Mitigation Framework**

Following the full implementation of STIR/SHAKEN, HBSS will enhance its robocall mitigation efforts as follows:

- (i) Call Authentication: Bandwidth, Inc. will utilize HBSS's STIR/SHAKEN certificate to authenticate all outbound calls, applying the appropriate attestation levels to verify call legitimacy.
- (ii) Industry-Wide Trust and Verification: Downstream service providers will be able to validate HBSS's call signatures, reducing the risk of legitimate calls being flagged as fraudulent while preventing unlawful robocalls from being associated with HBSS's network.
- (iii) Ongoing Compliance Monitoring: HBSS will continue to monitor regulatory developments and update its mitigation practices as necessary to maintain compliance with FCC rules, state laws, and industry best practices.

Traceback Cooperation

HBSS is committed to responding to all traceback requests from the FCC, law enforcement, and the industry traceback consortium within 24 hours of receipt. The designated contact person responsible for handling traceback requests is:

Name: Kathleen Chamberlain
Title: Senior Executive Assistant
Email: kdc@hbssonline.com
Phone: 978-379-0010

Upon receiving a traceback request, we promptly acknowledge receipt and initiate a thorough investigation of the call details using available logs and relevant information. Our team ensures a comprehensive response within the stipulated timeframe. We are committed to full cooperation with traceback entities to identify and prevent illegal robocalling activities.

Certification Statement

The undersigned certifies that the information provided in this Robocall Mitigation Program Description is accurate and complete to the best of my knowledge and belief. HBSS Connect Corp. understands its obligations under the Robocall Mitigation Database rules and is committed to ongoing compliance.

SD// Surinder Ahluwalia//
Surinder Ahluwalia, Esq.
Legal Counsel / Chief Administrative Officer
HBSS Connect Corp.