

Robocall Mitigation Program Description – Olivia LLC

Company Name: Olivia LLC

FCC Registration Number (FRN): 0036909661

Filing Category: No STIR/SHAKEN Implementation (47 CFR § 64.6304(a)(1))

Filer Exemption Basis: Non-IP Network (TDM) – Not capable of implementing STIR/SHAKEN.

Overview:

Olivia LLC operates a voice network that originates all calls over non-IP-based technology (Time Division Multiplexing - TDM). As such, the company is technically unable to implement the STIR/SHAKEN caller ID authentication framework and qualifies for an exemption under 47 CFR § 64.6304(a)(1).

Nevertheless, Olivia LLC has established and actively maintains a robocall mitigation program in full compliance with 47 CFR § 64.6305(a), designed to identify, prevent, and respond to the origination of illegal robocalls on its network.

Robocall Mitigation Practices:

1. Customer Vetting and Onboarding:

- Olivia LLC conducts **Know Your Customer (KYC)** procedures for all new customers prior to activation. This includes identity verification, traffic profiling, and service intent disclosure.
- Business customers are subject to a stricter onboarding policy, including business verification, ownership information, and expected call volume details.

2. Traffic Monitoring and Analytics:

- Olivia LLC uses automated traffic monitoring tools to detect **unusual calling patterns**, such as high call-per-second (CPS) rates, short-duration calls, and excessive calls to invalid or unassigned numbers.
- Alerts are generated when calls show signs of **autodialing**, **caller ID spoofing**, or potential **robocall behavior**.

3. Traceback and Cooperation Commitment:

- Olivia LLC is fully committed to **cooperating with the FCC, law enforcement, and the Industry Traceback Group (ITG)**.
- The company responds to all **traceback requests within 24 hours**, provides full call detail records, and assists in identifying and terminating illegal robocall sources.

4. Call Blocking and Termination:

- When illegal or suspicious traffic is identified, Olivia LLC may **suspend or terminate the offending customer's service** immediately.
- The company also supports **call blocking** efforts in coordination with upstream and downstream carriers when necessary.

5. Ongoing Monitoring and Policy Enforcement:

- Olivia LLC reviews its mitigation policies **quarterly**, and updates processes and detection thresholds in response to emerging robocall trends and regulatory guidance.
- Training is provided to customer service and technical staff to ensure compliance and rapid response to any suspicious activity.

Conclusion:

Although Olivia LLC cannot implement STIR/SHAKEN due to the limitations of its TDM-based infrastructure, the company is committed to **preventing illegal robocall origination** and remains in full compliance with the requirements set forth in **47 CFR § 64.6305(a)**. The robocall mitigation program in place is designed to ensure the security, trust, and integrity of its voice services, with a proactive approach to enforcement and industry collaboration.

OWNERSHIP AND AFFILIATES

Principals:

- Olivia LLC is a privately held company. The principal and authorized representative is:

Name: Janet Bradford

Title: CEO

Contact: janet.bradford@olivialtd.com

Affiliates:

- Olivia LLC does not have any affiliated companies engaged in voice services or related telecommunications activities.

Subsidiaries:

- Olivia LLC does not own or operate any subsidiaries involved in the provision of voice services or telecommunications.

Parent Companies:

- Olivia LLC is independently owned and operated. It does not have a parent company.