

Stratus Telecom Robocall Mitigation Plan

Pursuant to 47 CFR § 64.6305(d)(ii)-(iii)

I. Introduction

This Robocall Mitigation Plan ("Plan") is designed to meet the requirements outlined in 47 CFR § 64.6305(d)(ii)-(iii), which directs voice service providers and other entities involved in terminating calls to ensure that they adopt effective measures to mitigate robocall traffic. This plan outlines the actions taken by Stratus Telecom LLC ("Company") to comply with federal regulations intended to reduce the occurrence of illegal robocalls and spam calls.

II. Objective

The objective of this Plan is to implement measures that:

Prevent, detect, and respond to illegal robocall traffic.

Ensure compliance with the relevant provisions of the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, and other applicable regulations.

Protect consumers from the harm caused by robocalls.

III. Identification of Responsible Parties

The following individuals are responsible for ensuring the implementation and maintenance of this Robocall Mitigation Plan:

Robocall Mitigation Program Manager: Dave Boynton (603-846-6090)

Compliance Officer: Dave Boynton (603-846-6090)

Technical Lead: Dan Boynton (603-846-6090)

IV. Measures to Mitigate Robocall Traffic

In compliance with 47 CFR § 64.6305(d)(ii)-(iii), Stratus Telecom LLC has implemented the following measures to mitigate robocall traffic:

1. Implementation of STIR/SHAKEN Protocols

Stratus Telecom LLC has implemented the STIR/SHAKEN (Secure Telephone Identity Revisited/Signature-based Handling of Asserted information using toKENs) caller authentication framework for verifying the

authenticity of caller information. This framework ensures that calls with valid caller ID information are distinguished from those with spoofed or falsified information.

We have ensured that all calls originating from our network are properly authenticated using STIR/SHAKEN protocols, as required by law.

2. Use of Call Blocking and Filtering Technology

3. Monitoring and Reporting of Robocall Traffic

Continuous monitoring of call traffic will be conducted to identify any patterns indicative of robocall campaigns or abnormal call volumes.

Any potential issues will be investigated and addressed promptly. We will work with relevant stakeholders (e.g., the Federal Communications Commission (FCC) and the Robocall Mitigation Database) to report findings and provide necessary data to ensure that illegal robocalls are appropriately mitigated.

4. Compliance with FCC Rules and Requirements

We will continue to monitor updates to FCC rules and regulations and implement any necessary changes to our processes to maintain compliance.

V. Verification of Compliance with Robocall Mitigation Requirements

To demonstrate that Stratus Telecom LLC is in full compliance with 47 CFR § 64.6305(d)(ii)-(iii), the following steps have been put in place:

Software introduced to monitor outbound voice traffic in real-time to prevent the origination of illegal robocalls.

Certification of STIR/SHAKEN Compliance

We will also ensure that we are listed in the Robocall Mitigation Database, which serves as a public record of our compliance.

Third-party assessments will be considered as necessary to verify compliance with regulatory requirements.

VI. Mitigation Efforts for Non-Compliant Entities

In the event that Stratus Telecom LLC is found to be receiving traffic from non-compliant entities, we will take the following actions:

Investigate and Address Non-Compliant Traffic

If we identify any source of traffic that does not comply with STIR/SHAKEN or other robocall mitigation requirements, we will initiate a thorough investigation to identify the root cause and take corrective actions.

Cut-Off or Termination of Non-Compliant Traffic

If necessary, traffic from non-compliant entities will be blocked or terminated in accordance with regulatory guidelines to prevent illegal robocalls from being passed through to consumers.

VII. Customer Education and Transparency

We are committed to educating our customers about robocall protection measures, including:

Providing Information on Call Blocking

VIII. Conclusion

Stratus Telecom LLC is committed to fully complying with 47 CFR § 64.6305(d)(ii)-(iii) and all applicable federal and state regulations related to robocall mitigation. Through the implementation of robust technologies, monitoring systems, and compliance protocols, we are dedicated to mitigating robocall traffic and ensuring a safer and more reliable calling experience for our customers.

Signed,

A handwritten signature in black ink that reads "David Boynton". The signature is written in a cursive, flowing style.

David Boynton

Owner/COO

2/28/25