



April 4, 2025

Re. **Robocall Mitigation Plan**

Charter Technologies Inc is a small VOIP services reseller that works with businesses and public sector customers in Michigan. Primarily CTI resells VOIP services from VOIP Innovations/Sangoma

As of this date, Charter Technologies Inc. has not implemented STIR/SHAKEN and is thus submitting this Robocall Mitigation Plan (RMP) into the FCC's Robocall Mitigation Database.

Robocall Mitigation Plan

CTI is currently in discussion to implement carrier level STIR/SHAKEN mechanism based on VOIP Innovation/Sangoma carrier level services. In addition the following steps have been implemented in interim to address robocall mitigation:

- **Customer Risk Management:** CTI serves primarily business customers so we have established procedures to verify customer company, contact and address information and discourage high volume, auto dialer, robocaller activity prior to onboarding. This helps us to avoid signing such customers in the first place. For this reason, we consider CTI customers to be very low risk for originating robocalls.
- **Terms of Service:** CTI enforces a strict policy disallowing auto dialer and robocaller activity. Customers are required to accept these Terms of Service when signing up for services.
- **Caller ID Control:** CTI directly manages and restricts the Caller ID Number displayed on calls by most customers.
- **Blocking Invalid ANI:** CTI blocks calls originating from invalid numbers in accordance with Compliance and Enforcement and Telecom Regulatory Policy CRTC 2018-484 (Implementation of universal network-level blocking of calls with blatantly illegitimate caller identification).
- **Fraud Monitoring:** CTI actively monitors network traffic to identify abnormally high call volume, abnormal calling patterns and suspicious activity that may be indicators of robocall activity and/or caller id spoofing. Where such activity is detected, customers are alerted to verify legitimacy of the traffic to ensure compliance with CTI terms of service.
- **Traceback Requests**
CTI maintains detailed call records for all activity on its network and will cooperate and respond promptly to inquiries received from law enforcement and regulatory bodies investigating illegal robocalling activity.

Regards,

Mikhail Karasev
President