

Robocall Mitigation Plan for Blue Wave Telecom LLC

Company Name: Blue Wave Telecom LLC

Plan Submission Date: 4/25/.2024

Description of Robocall Mitigation Program:

Blue Wave Telecom LLC has implemented a robocall mitigation program designed to prevent the origination, transmission, or termination of illegal robocalls on its network. Our strategy includes both proactive and reactive measures to identify and mitigate suspicious traffic patterns, as well as close coordination with upstream and downstream carriers to enhance call legitimacy.

Call Analytics and Traffic Monitoring:

We continuously monitor voice traffic patterns using automated and manual tools. These tools help identify:

- High-volume calling patterns indicative of robocalling
- Calls with very short durations and repetitive destinations
- Traffic originating from known high-risk sources or geographies Traffic that meets these suspicious criteria is flagged for further investigation or temporarily blocked pending verification.

Caller Identity Verification:

Blue Wave Telecom LLC conducts Know Your Customer (KYC) procedures for all customers. This includes:

- Collecting and verifying business registration documents
- Conducting due diligence on the customer's use cases for voice services
- Requiring attestation that customers will not use the service for unlawful robocalling

Customers found to be in violation of our terms are subject to immediate suspension and/or termination.

Complaint Intake and Resolution:

We maintain a dedicated abuse reporting channel to receive and investigate robocall-related complaints. Complaints can be submitted via email or web form and are reviewed within one business day. If warranted, corrective action is taken, which may include blocking call paths or terminating customer accounts.

Cooperation with Law Enforcement and Industry Partners:

Blue Wave Telecom LLC cooperates with federal and state law enforcement agencies, as well as industry traceback initiatives led by the Industry Traceback Group (ITG). We respond promptly to traceback requests and maintain records necessary to assist in investigations. 6. Employee Training and Internal Controls All relevant staff are trained on robocall mitigation procedures and are required to follow company policies related to customer vetting, traffic monitoring, and incident handling. Internal controls are reviewed periodically to ensure compliance and effectiveness.