

INFORMATION TECHNOLOGY & TELECOM SOLUTIONS

Robocall Mitigation Plan

FCC Compliance Submission Under 47 C.F.R. § 64.6305

I. Provider Overview

INFORMATION TECHNOLOGY & TELECOM SOLUTIONS ("INFORMATION TECHNOLOGY & TELECOM SOLUTIONS") is an **interconnected VoIP provider** specializing in international gateway traffic collection. This document outlines INFORMATION TECHNOLOGY & TELECOM SOLUTIONS's **Robocall Mitigation Program (RMP)**, including:

- Implementation of **STIR/SHAKEN** call authentication (pursuant to the FCC's extension for small providers).
- Practices to **prevent, detect, and mitigate illegal robocalls** originating from or traversing its network.

Commitment: INFORMATION TECHNOLOGY & TELECOM SOLUTIONS adheres to **FCC regulations**, industry best practices, and cooperates fully with traceback requests to combat illegal robocalls.

II. Mitigation Measures

1. Customer Compliance & Enforcement

- All customers must **contractually agree** to comply with:
 - **FCC, FTC, TCPA, and state/federal anti-robocall laws.**
 - **Termination clauses** allowing INFORMATION TECHNOLOGY & TELECOM SOLUTIONS to **block/terminate services** for violations.

2. Know Your Customer (KYC) Policy

- **Applicable to:** Wholesale, enterprise, and call center customers.
- **Onboarding Verification:**
 - Collects **business address, primary contact, incorporation details, Tax ID, USAC ID, and banking information.**
 - Validates the **nature of business** to assess robocall risks.

3. Network Monitoring & Fraud Prevention

- **Continuous traffic analysis** to detect:
 - Robocalling patterns, traffic pumping, and international toll fraud.
- **Enforcement Actions:**
 - **Immediate blocking** of fraudulent traffic.
 - **Termination** of customers engaged in intentional illegal activities.

4. Carrier Vetting & Traffic Acceptance

- **Termination traffic is only accepted** from carriers:
 - Listed in the **FCC Robocall Mitigation Database**.
 - Compliant with **STIR/SHAKEN** and anti-robocall policies.

5. Traceback Cooperation

- **24/7 Response:**
 - Promptly cooperates with **FCC, law enforcement, and traceback consortiums** (within 24 hours).
 - Provides full assistance to **identify and stop illegal robocallers**.

III. STIR/SHAKEN Implementation

- **Current Status:**
 - Actively deploying **STIR/SHAKEN** across its IP network (utilizing the FCC's small provider extension).
- **Future Commitments:**
 - Ongoing upgrades to meet FCC deadlines.
 - Partnerships with **analytics providers** to enhance call authentication.

IV. Continuous Improvement

- **Adaptive Measures:**

- Regularly updates RMP to align with **evolving FCC rules and industry best practices.**
- Enhances **monitoring tools, KYC processes, and enforcement protocols.**