

ADK TELECOM SUPPORT SOLUTIONS, INC

Robocall Mitigation Program Description

FCC Compliance Reference: 47 CFR § 64.6305(d)-(f) | **FRN:** 0036818474 | **Filing Type:** Voice/Gateway/Intermediate Provider

1. Introduction & Compliance Framework

ADK TELECOM SUPPORT SOLUTIONS, INC is committed to combating illegal robocalls through a multi-layered mitigation strategy, registered with the **FCC Robocall Mitigation Database (RMD)**. This program adheres to:

- **FCC Rules:** STIR/SHAKEN implementation (47 CFR § 64.6300 *et seq.*), TRACED Act, and Industry Traceback Group (ITG) standards.
- **Industry Best Practices:** ATIS/SIP Forum standards, USTelecom Robocall Principles.
- **Dynamic Updates:** Reviewed quarterly to address emerging threats (e.g., AI-generated calls, international gateway fraud).

Provider Classification:

- ☒ **Voice Service Provider** (Role: ☒ End-user serving | ☐ Wholesale origination | ☐ Both).
- **Gateway Provider** (STIR/SHAKEN Status: ☐ Implemented | ☐ Exempt under § ____).
- **Non-Gateway Intermediate Provider** (Mitigation Protocol: ☐ Full attestation | ☐ Alternative measures).

2. Robocall Mitigation Measures

2.1 Call Authentication & STIR/SHAKEN Implementation

- **Attestation Levels:**
 - **Full A-Level:** Applied to all ADK TELECOM SUPPORT SOLUTIONS, INC-originated calls with verified caller ID.

- **Partial B/C-Level:** Used for legacy networks or exempted traffic (documented per § 64.6301(c)).
- **Technical Integration:**
 - SIP-based STIR/SHAKEN implementation via [Vendor Name] (certified by ATIS/SIP Forum).
 - TDR (Tokenized Device Reference) validation for mobile-originated calls.
 - **Failover Protocol:** Non-authenticated calls routed for additional screening (Section 2.3).

2.2 Proactive Call Monitoring & Analytics

Real-Time Traffic Analysis:

- **AI-Driven Tools:** Deploy [Tool Name] to detect:
 - **Volume Spikes:** >10,000 calls/hour from single source.
 - **Geographic Anomalies:** Calls originating overseas but spoofing U.S. numbers.

Data Cross-Referencing:

- **Blocklists:** DNO (Do Not Originate), FCC Consumer Complaint Database, RMD flagged providers.
- **Unallocated Number Checks:** Real-time queries against NRUF (Numbering Resource Utilization/Forecast) data.

2.3 Call Blocking & Mitigation Actions

Automated Enforcement:

- **Tier 1 (High Risk):** Immediate blocking for:
 - Calls from DNO-listed numbers.
 - Calls with "Invalid" or "No Verification" STIR/SHAKEN status.
- **Tier 2 (Suspicious):** Flagged for manual review if:
 - Call duration <5 seconds (potential "one-ring" scams).
 - Caller ID mismatches CNAM (e.g., "IRS" displayed for non-government number).

Provider Collaboration:

- **Traceback Requests:** Fulfilled within 24 hours for FCC/ITG/law enforcement.
 - **Upstream/Downstream Notifications:** Alerts sent via [Secure Portal/API] for suspected fraudulent traffic.
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3. Network Security & Compliance

3.1 Fraud Prevention Protocols

- **Know Your Customer (KYC):**
 - Vetting for all new customers/clients (e.g., business licenses, EIN validation).
 - **High-Risk Client Monitoring:** Enhanced scrutiny for VoIP resellers, call centers.
- **Robocall Scoring Model:**
 - **Risk Factors:** Call frequency, destination patterns, STIR/SHAKEN attestation.
 - **Thresholds:** Scores >85/100 trigger automatic mitigation.

3.2 Recordkeeping & Audits

- **Log Retention:** 3 years for call detail records (CDRs), blocking actions.
- **Compliance Audits:** Biannual third-party reviews (last audit: [Date] by [Audit Firm]).

3.3 Customer & Regulatory Outreach

- **Consumer Education:**
 - Reporting portal for robocall complaints ([URL]).
 - Guides on FCC's "Do Not Call" registry enrollment.
 - **Regulatory Filings:**
 - Annual certification updates to FCC RMD.
 - Participation in USTelecom Robocall Task Force.
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4. Contact Information & Certification

4.1 Robocall Mitigation Point of Contact

- **Name:** Harry Parker.
- **Email/Phone:** roy.taylor@adk-telecom.com (720) 912-8923.

4.2 Officer Certification

"ADK TELECOM SUPPORT SOLUTIONS, INC certifies compliance with all FCC robocall mitigation rules, including STIR/SHAKEN where applicable. This program is reviewed quarterly, with updates filed promptly in the FCC RMD."