

PalmerMutual LLC – Robocall Mitigation Plan

Company Name: PalmerMutual LLC

FRN (FCC Registration Number): 0037035508

Responsible Officer: Mark Stringer , Director

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1. Overview of Voice Services

PalmerMutual LLC provides voice services via SIP trunking and hosted VoIP solutions to residential and business customers in the United States. The company does not operate as an originating service provider for high-volume call centers or auto-dialers.

2. STIR/SHAKEN Implementation Status

PalmerMutual LLC **has not implemented STIR/SHAKEN** in the IP portions of its network as it is currently not technically capable of doing so. As required under the TRACED Act and subsequent FCC orders, PalmerMutual has implemented a **robocall mitigation program** to prevent the origination of illegal robocalls.

3. Robocall Mitigation Practices

PalmerMutual LLC employs the following mitigation techniques:

A. Know-Your-Customer (KYC) Procedures

- All customers undergo strict identity verification before activation.
- Business customers must provide details of their use case, including call volume, industry, and intended destinations.
- We reject customers who intend to use our service for high-volume auto-dialing unless pre-approved for legitimate uses.

B. Traffic Monitoring & Analytics

- We utilize automated analytics tools to monitor call patterns for high call volume, short-duration calls, and high call failure rates.

- Any customer flagged for suspicious activity is immediately investigated.

C. Call Blocking and Labeling

- We block calls with invalid, unassigned, or spoofed caller ID numbers.
- Calls suspected to be robocalls are labeled accordingly for consumer awareness.

D. Complaint & Abuse Handling

- A designated email and phone number is maintained to receive robocall complaints from consumers and enforcement agencies.
 - All complaints are reviewed within 24 hours, and appropriate action is taken, including service suspension or termination.
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4. Caller ID Integrity

- PalmerMutual ensures that all outbound calls contain accurate and non-spoofed Caller ID information.
 - Customers are prohibited from using numbers they do not own or are not authorized to use.
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5. Industry Cooperation

- PalmerMutual participates in industry traceback efforts led by the **Industry Traceback Group (ITG)**.
 - We respond promptly to traceback requests and cooperate fully with enforcement agencies.
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6. Internal Policy Enforcement

- Violation of our robocall policy results in immediate warnings, service suspension, or termination depending on severity.
 - Contracts include specific clauses on prohibited robocall activity and legal compliance.
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7. Certification Statement

PalmerMutual LLC certifies that it has implemented the described robocall mitigation practices and will continue to update its practices in accordance with evolving FCC rules and industry standards.