

CallSigner LLC Robocall Mitigation Plan

CallSigner has taken reasonable measures to implement an effective framework to allow for compliance with the STIR/SHAKEN authentication program. We are an approved Active Service Provider registered with the STI-PA using OCN 295L. CallSigner has an active SPC token/STIR/SHAKEN certificate that is used when authenticating calls.

KYC and Customer Vetting

CallSigner has implemented a Know Your Customer (KYC) process to prohibit illegal calls before they are placed. CallSigner will vet the identity of customers by implementing the following phases:

Phase I

Customer intake and information gathering:

- Customer contact first and last name
- Company email and phone number
- Website Address
- Originating TN list
- Source IPs
- Current Service Provider
- Current Phone System

Phase II

Manual stop gap verifying the following:

- Valid business and banking reference
- Confirm the Legal Name through the relevant Secretary of State website. Incorporation and DBA
- Website and physical address verification
- Valid Customer EIN and Organization type
- Valid Billing contact and address
- Confirm that the customer contact email is a customer domain
- Validate via third party business verification services
- If both manual check and third party verification is satisfactory, then customer vetting is complete.

Phase III

Verification of originating numbers

- Check submitted TNs against Do Not Originate (DNO) Registry
- Require a signed Letter of Authorization (LOA) if deemed necessary
- Automated Callback to TNs
- Automated email sent to customer contact
- If origination numbers are considered valid then the number vetting phase is complete.

Phase IV

Verify the terminating numbers against a Do Not Call (DNC) Registry if necessary

- Calls will not be authenticated or branded if the terminating number matches against the local DNC list.

Additional Verification

CallSigner requires a customer to identify itself as a compliant caller. Customers will fail vetting if deemed to be a non-compliant caller by this definition:

“Non-Compliant Caller” means both an Illegal Caller, and a customer that has a Content Violation in their RCD or violates SHAFT requirements.

CallSigner also incorporates the use of Third party business verification services. Additionally, the operations team monitors anomalies in calling patterns for customer accounts.

Suspension of Service

If determined that the customer initiated suspicious and illegal robocalls, a warning is issued to the customer to discontinue sending such traffic. If such traffic continues, the customer account is suspended or service is terminated.

Traceback Requests

CallSigner commits to respond fully to all traceback requests from the FCC, law enforcement and the industry traceback consortium within 24 hours, and to cooperate with such entities in investigating and stopping illegal robocallers that use the CallSigner service.