

Robocall Mitigation Plan

Company Name: Promedhair

Date: June 3, 2025

Prepared by: Compliance Department, Promedhair Inc.

1. Company Overview

Promedhair Inc. is a healthcare technology and telemedicine provider headquartered in Atlanta, Georgia. We provide virtual consultations, prescription services, and health-related product delivery. As part of our operations, we conduct outbound calling to patients, healthcare partners, and vendors for legitimate business communications, such as appointment reminders, prescription confirmations, and customer support.

2. Role in Call Chain

Promedhair is a **non-facilities-based VoIP provider**. We do not own or operate any telephony infrastructure and instead rely entirely on upstream voice service providers for originating and terminating calls to the PSTN. We do not provide voice services to end-users outside our organization.

3. STIR/SHAKEN Implementation

Promedhair does not directly implement STIR/SHAKEN but ensures compliance through our third-party VoIP provider.

- **STIR/SHAKEN Participation:** Indirect (via upstream provider)
 - **Upstream Provider:** Voiso
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4. Robocall Mitigation Practices

Promedhair has implemented a multi-layered robocall mitigation strategy:

a. Customer/Usage Vetting

- Only internal departments are permitted to initiate outbound calling campaigns.
- No customer traffic is accepted or forwarded from third-party sources.
- Each department's use of calling systems is reviewed quarterly.

b. Call Authentication

- Only telephone numbers provisioned directly by Voiso and registered to Promedhair are used for outbound calls.
- All numbers are authenticated before use, and spoofing is explicitly prohibited by internal policy.

c. Traffic Monitoring

- Outbound traffic is monitored through call analytics provided by Voiso and Promedhair's in-house tools.
- Suspicious activity triggers an internal review by the Compliance Department.
- Calls per second (CPS) and average call duration (ACD) are tracked for anomalies.

d. Complaint Handling Process

- Complaints about unwanted or illegal robocalls are investigated within 48 hours.
- A dedicated hotline and email are available for inquiries and complaint resolution:
 - **Email:** robocall_compliance@promedhair.com
 - **Phone:** +1 (404) 555-2984

5. Numbering Resources and Usage

- All telephone numbers used by Promedhair are issued by Voiso Inc., our upstream VoIP provider.
 - These numbers are registered under Promedhair and are used only for business communications.
 - Numbers are tracked using our internal asset management system and reconciled monthly.
 - Numbers that are no longer in use are removed from campaigns and released back to the provider.
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6. Employee Training

Promedhair conducts mandatory training for employees involved in outbound communications:

- Topics include: robocall laws, TCPA compliance, caller ID transparency, and consent-based calling.
 - Refresher training occurs annually and upon any change in regulation.
 - All employees must sign a compliance acknowledgment form.
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7. Future Improvements

Promedhair is committed to continuously improving its robocall mitigation efforts:

- Integration of AI-based real-time traffic scoring tools is planned for Q4 2025.
 - We will conduct semi-annual audits of outbound call logs and caller ID practices.
 - Promedhair is actively cooperating with the Industry Traceback Group (ITG) and will respond to traceback requests within 24 hours.
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8. Contact Information for Enforcement Authorities

Designated Point of Contact for Robocall Mitigation:

Name: Rachel Morris

Title: Director of Compliance

Email: rmorris@promedhair.com

Phone: +1 (404) 555-2984

Address:

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