

Robocall Mitigation Program Description

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Company Name: Iris Technology Group, LLC

Overview

Iris Technology Group, LLC has implemented a comprehensive Robocall Mitigation Program (RMP) in accordance with the FCC's rules under 47 CFR § 64.6305, to prevent the origination and transmission of illegal and unwanted robocalls on its voice network. This program is in place as part of our commitment to protecting consumers and ensuring trust in the voice communications ecosystem.

Program Scope

This Robocall Mitigation Program applies to all calls originated by our end users and those transiting our network. We primarily serve enterprise and business customers, and do not knowingly allow access to our network for illegal robocallers.

Mitigation Practices

1. Know Your Customer (KYC) Procedures

- We verify the identity of all customers before activation, including business name, address, contact information, and proof of legal existence (e.g., EIN, state registration).
- We conduct periodic reviews to ensure continued legitimacy of customer activity.

2. Call Analytics and Monitoring

- We utilize real-time call analytics platforms and third-party tools to detect high-volume, short-duration call patterns typical of illegal robocalling behavior.
- Suspicious traffic is flagged and reviewed by our compliance team.

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3. Traffic Blocking and Rate Limiting

- Calls originating from customers found to be generating unlawful traffic are subject to immediate rate limiting or blocking.
- We work closely with upstream and downstream carriers to trace and eliminate bad actors.

4. STIR/SHAKEN Participation

- We have implemented STIR/SHAKEN in our IP-based voice network and sign calls with full (A), partial (B), or gateway (C) attestation based on customer validation level.

5. Complaint and Traceback Response

- We promptly investigate traceback requests from the Industry Traceback Group (ITG), the FCC, or other recognized entities.
- We maintain logs and call detail records (CDRs) to facilitate accurate and timely responses.

6. Customer Education and Policies

- All customers are required to agree to our Acceptable Use Policy, which explicitly prohibits illegal robocalling.
- We provide education materials to customers about legal calling practices and consequences of violations.

Compliance and Reporting

- We maintain internal logs of mitigation actions and periodic reviews of our program's effectiveness.
- Updates to this program are made as required to remain compliant with FCC regulations and evolving robocall threats.