



Robocall Mitigation Program Description

We are a non-facilities-based voice service provider and do not operate our own network infrastructure. As such, we have not implemented the STIR/SHAKEN framework on any portion of our network.

However, we fully comply with 47 CFR § 64.6305(a) and have implemented a comprehensive Robocall Mitigation Program that includes the following key elements:

1. **Customer Vetting (Know Your Customer):**
Every customer undergoes a thorough onboarding process that includes identity verification, business registration checks, and validation of the intended use of our services to ensure legitimacy.
2. **Traffic Monitoring and Detection:**
We utilize automated systems to monitor call traffic patterns in real-time. This helps identify high-risk behavior and detect potential illegal robocall activity before it escalates.
3. **Traceback Cooperation and Responsiveness:**
We respond to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group within 24 hours. We retain call detail records and collaborate fully with investigations as required.
4. **Use of Upstream Providers with STIR/SHAKEN Compliance:**
Although we do not implement STIR/SHAKEN directly, our upstream carriers have implemented it. We rely on their infrastructure to ensure the integrity of call origination.
5. **Internal Procedures and Policy Review:**
Our internal compliance policies are reviewed regularly. We maintain logs, update risk assessments, and ensure staff and customers are informed about responsible and lawful telecom use.

This Robocall Mitigation Program reflects our ongoing commitment to combat illegal robocalling, protect our customers, and uphold the trust and security of telecommunications services.