

Robocall Mitigation Program Description

Provider Type: Non-Gateway Intermediate Provider

Regulatory Reference: 47 CFR § 64.6305(f)(ii)–(iii)

1. Introduction and Overview

This Robocall Mitigation Program ("Program") sets forth the policies, procedures, and analytics we employ to prevent and mitigate illegal robocalling. As a Non-Gateway Intermediate Provider, our role is to pass calls between gateway providers and ensure compliance with applicable FCC rules.

2. Governance and Accountability

- **Program Owner:** Chief Compliance Officer, Taylor Murray
- **Review Frequency:** Annual review and update, or upon material regulatory changes.
- **Escalation Process:** Any suspected robocall incidents are escalated to the Compliance Committee within 24 hours.

3. Customer Vetting and "Know Your Customer"

- We collect and verify customer identity for all new accounts:
 - Government-issued ID or corporate paperwork
 - Proof of address
- We perform ongoing monitoring of customer usage patterns for anomalies.

4. Call Authentication and SHAKEN/STIR

- We do not originate or terminate PSTN calls under our own certificate.
- We verify incoming PASSporTs (from Commio) for valid signature and timestamp.
- We ensure forward of authenticated PASSporTs to downstream providers (Twilio).

5. Analytics and Risk Controls

- **Traffic Monitoring:**
 - Real-time call volume thresholds per customer
 - Daily automated reports highlighting spikes in call attempts
- **Pattern Analysis:**
 - Detection of autodialing patterns
- **Automated Alerts:**
 - Alerts to compliance team when thresholds exceeded

6. Traceback and Complaints Handling

- **Traceback Cooperation:**
 - Twilio will log call metadata (timestamps, SIP headers)
 - We will cooperate with traceback requests from FCC or industry traceback partners.
- **Customer Complaints:**
 - Centralized complaint portal and logging
 - Acknowledge complaints within 2 business days and investigate within 10 business days.

7. Incident Response and Remediation

- **Incident Plan:**
 - Upon detection of illegal robocall traffic, immediately throttle or block the offending customer.
 - Notify upstream and downstream partners within 2 hours.
- **Documentation:**
 - Maintain incident logs and corrective actions for 2 years.

8. Training and Awareness

- All staff involved in customer onboarding and support receive annual training on robocall regulations and mitigation responsibilities.

9. Recordkeeping and Reporting

- **Records Retention:**
 - Customer vetting documentation: 2 years after account closure
 - Call metadata: 90 days. Twilio and Commio will maintain for longer.
 - Incident logs: 2 years
- **Reporting to FCC:**
 - File updates to mitigation plan as needed per FCC Public Notice DA 24-73.