



Robocall Mitigation Plan

Prepared by: IT Auditors PR, Corp.

Effective Date: July 1, 2025

FCC Registration Number (FRN): 0023219439

Operating Company Number (OCN): in progress

1. Company Information

Legal Name: IT Auditors PR, Corp.

Headquarters: HC 9 Box 13076, Aguadilla, PR 00603

Service Region: Puerto Rico

Type of Provider: VoIP and Voice Service Provider

Contact for Robocall Mitigation Issues:

- **Name:** Hector Jose Crespo
- **Title:** Chief Executive Officer
- **Email:** hectorjose@itauditorspr.com
- **Phone:** 1.787.431.2602

2. STIR/SHAKEN Implementation Status

IT Auditors PR, Corp. is in the process of implementing STIR/SHAKEN on its IP-based voice network using **ClearIP from TransNexus** to support the following functions:

- STI Authentication
- STI Certificate Generation
- STI Verification

Calls that traverse IP networks will be signed and validated in compliance with 47 CFR § 64.6301. For portions of the network that rely on non-IP technology, mitigation procedures are outlined in this document per § 64.6305(d)(2)-(3).

3. Robocall Mitigation Program Components

a. Know Your Customer (KYC)

- All customers undergo a KYC process, including:
 - Verification of business registration (EIN, incorporation documents)
 - Physical address validation
 - Tax ID and personal contact information
 - Review of service use cases (e.g., no telemarketing without prior approval)
- Customers must agree to Acceptable Use Policies prohibiting illegal robocalls.
- High-risk customers or traffic patterns are subject to enhanced due diligence.



b. Call Analytics, Blocking & Monitoring

IT Auditors PR, Corp. employs the following ClearIP modules for continuous monitoring and enforcement:

- **Inbound Shield:** Blocks inbound calls from known robocall sources based on network-wide threat intelligence.
- **Reputation Lookup:** Flags and optionally blocks calls based on number reputation scores.
- **Reporting:** Provides analytics and compliance documentation for traffic monitoring, compliance auditing, and traceback.

Outbound call traffic is validated and scored for anomaly patterns, including:

- High call volumes in short durations
- Short-duration call floods
- Invalid or malformed caller IDs
- Sequential dialing behavior

Suspicious traffic is automatically blocked or quarantined for manual review.

c. Telephone Number Validation

- Caller IDs used by customers must match assigned numbers.
- Number registration is managed internally or validated through upstream provider agreements.
- Any request to use third-party numbers must be approved with documentation.

4. Upstream Provider Management

- IT Auditors PR only connects with upstream providers:
 - That are registered in the FCC Robocall Mitigation Database
 - That provide signed calls using STIR/SHAKEN where possible
- Provider contracts include robocall mitigation clauses and require traceback cooperation.

5. Traceback Cooperation

- We cooperate fully with all traceback requests from the FCC, USTelecom's Industry Traceback Group, and law enforcement.
- Our internal policy is to respond within **24 hours** to all verified traceback requests.
- The CEO (Hector Jose Crespo) is the designated point of contact.

6. Incident Response Procedures

Upon detection of suspicious robocall activity:

- Traffic is automatically blocked or diverted for review
- The customer is contacted for verification
- If no valid justification is provided, services are suspended or terminated

7. Compliance & Certification

IT Auditors PR, Corp. certifies that:

- We have not been subject to any enforcement action related to robocalls or spoofing.
- We maintain accurate records of robocall mitigation activities.
- This Robocall Mitigation Plan meets the requirements of 47 CFR § 64.6305(d)(2)-(3).
- Updates to this plan will be filed within **10 days** of material change.

8. Confidentiality

If filing in WC Docket No. 17-97, IT Auditors PR, Corp. may submit both redacted (public) and unredacted (confidential) versions of this plan for proprietary portions, especially those referencing specific network security strategies or third-party vendor contracts.

Signed:



Hector Jose Crespo
Chief Executive Officer
IT Auditors PR, Corp.
Date: 7/1/2025