

Robocall Mitigation Plan for City Financial Services Inc.

Introduction

Objective: To establish and maintain robust measures to identify, manage, and mitigate illegal and unwanted robocalls through our platform.

Commitment: City Financial Services, Inc is dedicated to protecting our customers and the integrity of our voice service platform from fraudulent and nuisance calls and being a part of the solution by preventing access to software tools that profligate illegal calls.

Governance

Oversight Committee: We are a small team led by the Chief Executive Officer (CEO) who oversee the robocall mitigation program, establishes Know Your Customer (KYC) policies, and ensure internal compliance with these policies.

Responsibilities: The team will follow our strict KYC policy, monitoring calls, auditing consents, and implementing the policies established to prevent illegal and unwanted robocalls.

Compliance with STIR/SHAKEN

Implementation Status: Stir shaken is handed by our downstream carrier, however, all of our calls have attestation.

Verification Process: The carrier handles the Stir Shaken.

Mitigation Techniques

Call Analysis: We proactively monitor call volumes and are alerted for volume anomalies. These are the measures take to prevent abusive call volumes:

1. KYC enforcement: The policy aims at knowing the client's business, reviewing and verifying consent for each call made, and understanding their daily call volumes.
2. Limits on accounts: Accounts have limits on the number of calls per second. Justification is required for increases.

Blocking and Filtering: We utilize Calls Per Second caps to control call volume, the system allows for immediate blocking of calls through an admin interface should we determine any unfavorable behavior.

Partner Engagement

Collaboration: We work closely with our carrier partners to align with their call metrics and FYI policy. This is an ongoing collaboration between the companies.

Traceback Participation: City Financial Services, Inc participates in traceback investigations to help identify and mitigate sources of illegal robocalls.

Customer Complaint Handling

Response Protocol: The internal procedure for responding to a complaint is to immediately call the client and to notify them we will limit their calls while an investigation is performed. The investigation reviews the consent, their call practices, their compliance with internal DNC and external DNC's.

Training and Awareness

Employee Training: We conduct regular training sessions for employees to recognize and report potential robocall activities.

Reporting and Record Keeping

Documentation: We maintain records of robocall mitigation efforts, including call analysis reports, customer complaints, and actions taken.

Regulatory Compliance: We provide timely submission of required reports to regulatory bodies.

Program Review

Regular Assessments: Conduct semi-annual reviews of the robocall mitigation program to evaluate its effectiveness and perform audits to ensure our controls are sufficient.