

Robocall Mitigation Program Description

As a small, private voice and/or gateway provider, our organization does not currently have the technical or operational capability to implement the STIR/SHAKEN authentication framework on any portion of its network. We do not have direct IP interconnection with downstream voice service providers, nor do we have access to the necessary Secure Telephone Identity (STI) tokens required for STIR/SHAKEN participation. Our operations are conducted through TDM or non-IP-based systems. In accordance with 47 CFR § 64.6305(a)-(b), we have implemented a robocall mitigation program that includes the following:

- Routine monitoring of voice traffic patterns for anomalies indicating potential illegal robocall campaigns.
- Strict access controls on any systems used for originating voice traffic.
- Cooperation with traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) within 24 hours of receiving a request.
- Internal record-keeping of all traffic sources and customers to ensure accountability.
- No prior revocation or prohibition by the Commission from participating in the Robocall Mitigation Database.

Our organization certifies that it will continue to comply with these obligations in good faith and will take all reasonable steps to prevent the origination or transmission of illegal robocall traffic across its network.