



ITP 360 LLC
888-274-4529
8051 N. TAMIAMI TRAIL STE E6
SARASOTA, FL 34243

Robocall Mitigation Plan

ITP 360 LLC
FRN: 0033281734

Robocall Mitigation Contact:

- Name: Xavier Garnicas
- Title: Network Engineer / Compliance Contact
- Department: Network Operations
- Phone: 888-274-4529
- Email: noc@itp360.com

1. Provider Identification

ITP 360 LLC provides interconnected VoIP services in the United States. Our FCC FRN is 0033281734. We originate and route calls on behalf of our customers through upstream providers.

2. STIR/SHAKEN Status

ITP 360 LLC certifies **Partial STIR/SHAKEN Implementation** pursuant to **47 CFR § 64.6301(a)(4)**.

- Our outbound traffic is delivered primarily through upstream providers that perform STIR/SHAKEN authentication on our behalf for IP-enabled portions of our network.
- Because we do not hold an Operating Company Number (OCN), we cannot directly participate in the STIR/SHAKEN governance framework to sign calls ourselves.
- However, all IP-originated calls that can be authenticated are signed by our upstream partners.

For any calls not yet covered by STIR/SHAKEN, we enforce a robocall mitigation program consistent with **47 CFR § 64.6305(a)**.

3. Robocall Mitigation Program

Customer Vetting (Know Your Customer)

- All new and renewing customers undergo identity verification (valid business registration, EIN, physical address, and contact verification).
- Disposable email accounts, unverifiable businesses, and high-risk applicants are rejected.
- Customer accounts are periodically reviewed for compliance.

Call Analytics and Monitoring

- We monitor traffic for anomalies such as high call volumes, short-duration calls, repetitive dialing, or suspicious patterns.
- We use both internal tools and external analytics partners to identify potentially illegal robocall traffic.
- Customers generating suspicious traffic are immediately investigated and may be suspended or terminated.

Traceback Cooperation

- ITP 360 LLC commits to responding fully and within **24 hours** to traceback requests from the FCC, law enforcement, or the Industry Traceback Group (ITG).
- Our designated compliance contact has full authority to respond to traceback requests.

Upstream/Downstream Due Diligence

- We only interconnect with upstream providers that are registered in the FCC's Robocall Mitigation Database.
- We periodically confirm that our partners remain compliant with RMD filing requirements.

Enforcement and Mitigation Actions

If suspicious robocall traffic is detected:

1. We immediately investigate the traffic.
 2. Suspend the affected customer's outbound calling privileges.
 3. Terminate accounts proven to be originating illegal robocalls.
 4. Notify upstream providers and regulators as necessary.
-

4. Corporate Disclosures

- **Principals:**
 - New Wave Financial Management LLC (controlling member)
- **Parent Companies:**
 - New Wave Financial Management LLC
- **Affiliates:**
 - None
- **Subsidiaries:**
 - None

5. Compliance Statement

ITP 360 LLC certifies under penalty of perjury that this Robocall Mitigation Plan is true and correct.

We commit to ongoing compliance with **47 CFR § 64.6305**, including maintaining this mitigation program, updating the FCC's Robocall Mitigation Database as required, and fully cooperating with enforcement and traceback requests.