

Cloudhook Communications LLC – Robocall Mitigation Plan

1. Purpose and Scope

Cloudhook Communications LLC provides voice services using FusionPBX and FreePBX for call management, with Bandwidth.com CLEC, LLC as our voice termination provider. This Robocall Mitigation Plan outlines the policies, procedures, and technical safeguards we use to prevent the origination of illegal robocall traffic, in compliance with FCC requirements under 47 CFR §64.6305(a)(1).

2. Customer Vetting and Service Restrictions

- Strict Vetting: We do not provide wholesale VoIP services or permit anonymous sign-ups. All clients are either local businesses or organizations with whom we have a direct relationship.
- Approval Process: Each customer is vetted by management prior to service activation. This includes verification of business identity and use case.
- Controlled Provisioning: All outbound SIP trunks and terminations are provisioned exclusively by Cloudhook Communications' staff technicians. Customers do not have unrestricted access to originate traffic outside of approved configurations.
- Acceptable Use Policy: Customers agree to terms of service prohibiting illegal robocalls, fraud, or abusive calling patterns. Violations may result in immediate suspension or termination.

3. Call Monitoring and Fraud Prevention

- Traffic Analysis: Outbound calls are continuously monitored for abnormal patterns, including:
 - Short-duration, high-volume calling.
 - Calls to high-risk or known fraudulent destinations.
 - Unusual spikes in call attempts or volumes.
- Automated Alerts: Network alerts trigger immediate review of suspicious call activity by our operations team.
- Intervention Measures: If illegal or fraudulent call patterns are detected, outbound traffic may be temporarily blocked pending investigation.

4. STIR/SHAKEN and Caller ID Authentication

Cloudhook Communications supports STIR/SHAKEN through Bandwidth.com CLEC, LLC for outbound call authentication. Caller ID attestation levels are applied based on verified customer identity, ensuring accurate caller identification in compliance with FCC requirements.

5. Traceback and Enforcement Cooperation

- Commitment to 24-Hour Response: Cloudhook Communications commits to responding within 24 hours to all traceback requests from:
 - The FCC,
 - Law enforcement agencies, and
 - The designated industry traceback consortium.
- Cooperation: We will fully cooperate with these entities to investigate and stop any illegal robocallers that may attempt to use our services.
- Remediation: Any customer found originating illegal robocalls will have service immediately

suspended, with permanent termination where warranted.

6. Compliance and Continuous Improvement

- FCC Compliance: This plan fulfills the requirements of 47 CFR §64.6305(a)(1).
- Ongoing Review: Policies, monitoring practices, and security measures are reviewed regularly to ensure effectiveness and alignment with industry standards.
- Commitment: Cloudhook Communications is dedicated to preventing unlawful robocalls and ensuring the integrity of the communications ecosystem.