

Robocall Mitigation Program Description – System Won

As part of STIR/SHAKEN enforcement, on April 20, 2021, the FCC began requiring all providers to certify in the Robocall Mitigation Database (RMD) that they have either fully implemented STIR/SHAKEN or instituted a robocall mitigation program to ensure that they are not originating illegal robocalls.

System Won provides services through SkySwitch, our upstream carrier partner. Our policies are aligned with the FCC's regulations and SkySwitch's robocall mitigation program. System Won fall under their SkySwitch STIR/SHAKEN certification and compliance.

1. Customer Vetting

- We verify the identity and legitimacy of all customers before activation.
- We require acceptance of our Terms of Service, which explicitly prohibit the origination of unlawful robocalls.
- High-risk applicants are subject to additional scrutiny and may be denied service.

2. Traffic Monitoring

- SkySwitch software continuously monitors outbound traffic in real-time.
- Traffic is analyzed for the following indicators:
 - Invalid calling numbers
 - Unallocated calling numbers
 - Unusual calling patterns that may suggest illegal robocall activity
- Detailed reports are generated and alerts are issued if suspicious calls are detected.

3. Remediation and Enforcement

- If suspected illegal robocalls are identified, we and SkySwitch immediately investigate.
- Depending on the outcome, we may:
 - Warn the customer to stop
 - Suspend or terminate service for repeat or egregious violations

- We take swift action to prevent continued abuse.

4. STIR/SHAKEN Status

- SkySwitch has implemented STIR/SHAKEN on outbound calls where technically feasible.
- For calls outside STIR/SHAKEN scope, System Won relies on the above mitigation measures.

5. Point of Contact

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