

Robocall Mitigation Plan

Provider Name: Convergent Systems Technologies, Inc.

FRN: 0030114862

Filer Contact Information:

- Name: Philip Ciancimino
 - Title: President
 - Email: Philc@convergentssystemstech.com
 - Phone: 239-344-8316 Ext. 102
-

1. Provider Type

Convergent Systems Technologies, Inc. is a **Voice Service Provider** delivering VoIP services to customers in the United States. We operate under a **Master Carrier Agreement with PayG, LLC dba SkySwitch**. We do not interconnect directly with the public switched telephone network (PSTN); all interconnection and call signing is performed by SkySwitch and its underlying carriers.

2. STIR/SHAKEN Implementation Status

Convergent Systems Technologies, Inc. certifies **partial implementation** of STIR/SHAKEN pursuant to 47 CFR § 64.6305(a)(2).

Because Convergent Systems Technologies, Inc. does not hold numbering resources or maintain direct PSTN interconnection, we cannot obtain STI-PA certificates or perform call authentication directly. All calls originating from our customers are routed through:

PayG, LLC dba SkySwitch

101 S. Hoover Blvd., Suite 102

Tampa, FL 33609

(Additional Office: Arbor Crest I, 751 Arbor Way, Suite 150, Blue Bell, PA 19422)

SkySwitch and its underlying carriers perform full STIR/SHAKEN call authentication on all outbound calls prior to delivery to the PSTN. As a result, our customers' calls are fully signed in compliance with FCC requirements.

3. Robocall Mitigation Practices

In addition to relying on SkySwitch's STIR/SHAKEN implementation, Convergent Systems Technologies, Inc. has adopted robust mitigation measures to prevent the origination of unlawful robocalls on our network. These include:

- **Know Your Customer (KYC):** We verify the identity and legitimacy of all customers before service activation.
 - **Terms of Service Restrictions:** Customers must agree to strict prohibitions on unlawful robocalling; violations may result in immediate suspension or termination.
 - **Traffic Monitoring:** We monitor customer traffic for suspicious patterns such as high volumes, excessive short-duration calls, or unusual dialing activity.
 - **Complaint Handling:** We maintain a dedicated abuse reporting channel, and we respond promptly to complaints and traceback requests.
 - **Carrier Coordination:** We work directly with SkySwitch to block, restrict, or terminate traffic suspected of being unlawful.
-

4. Point of Contact for Robocall Mitigation

All robocall mitigation issues should be directed to:

Contact Name: Philip Ciancimino
Title: President
Email: Philc@convergentsystemstech.com
Phone: 239-344-8316 Ext. 102

5. Certification

Convergent Systems Technologies certifies that:

- All outbound calls are signed with STIR/SHAKEN by our upstream provider, PayG, LLC dba SkySwitch, and its underlying carriers.
- We have implemented the mitigation measures described above to prevent unlawful robocalls.
- We will cooperate with the FCC, law enforcement, and the Industry Traceback Group in investigations relating to suspected unlawful robocalls.