

Legacy IT llc VoIP Reseller Robocall Mitigation Program

1. Introduction

This Robocall Mitigation Program (RMP) is designed to comply with the FCC regulations under 47 CFR § 64.6305 and the TRACED Act. Our goal is to prevent illegal robocalls originating on our network and ensure full cooperation with law enforcement and the industry to trace and stop robocallers.

2. Scope

This program applies to all voice services resold by Legacy IT llc, a reseller of white-label phone services provided by CoreDial/SkySwitch. We certify compliance with STIR/SHAKEN as implemented by our wholesale provider.

3. Know Your Customer (KYC)

- We conduct customer vetting before service activation, including verification of business identity and contact information.
- We require customers to provide details on calling patterns and consent practices.
- Customers agree contractually to prohibit use of services for illegal robocalls.

4. Call Monitoring and Controls

- We monitor call detail records (CDRs) regularly for suspicious patterns typical of robocall activity (e.g., high volume, short call duration, caller ID spoofing).
- Volume limits and simultaneous call path controls are applied to mitigate mass robocall attempts.
- Customers exhibiting suspicious behaviors are investigated, and service may be suspended or terminated upon confirmation of policy violations.

5. STIR/SHAKEN Compliance

- Calls originated through our service are subject to STIR/SHAKEN authentication as implemented by CoreDial/SkySwitch.
- We verify and maintain updated information regarding the status of STIR/SHAKEN deployment with our provider.

6. Cooperation and Traceback

- We commit to responding fully and within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium.
- We actively cooperate with investigations to stop illegal robocaller use of our service.

7. Customer Education and Contractual Enforcement

- Customers are informed of robocall laws, FCC rules, and our robocall mitigation policies.
- Our terms of service include clear prohibitions against illegal robocall traffic and specify consequences for violations.

8. Reporting and Continuous Improvement

- We review and update this program annually or as regulatory requirements evolve.
- Incident response and mitigation actions are documented in detail.
- We remain engaged with industry best practices and compliance updates.