

Blue Sky Phone Solutions - Robocall Mitigation Program

Blue Sky Phone Solutions, LLC provides reliable and professional voice and UCaaS services to commercial end-users in the United States, using a white-labeled platform powered by SkySwitch. We do not operate a facilities-based IP network and do not directly implement STIR/SHAKEN call authentication. All outbound calls are routed through our upstream provider, who is fully registered and compliant with the STIR/SHAKEN requirements as outlined in the FCC's Robocall Mitigation Database.

In compliance with 47 CFR § 64.6305, we maintain the following robocall mitigation program:

1. Customer Vetting & Activation Controls

We apply a robust vetting process before activating any voice service account. Our Know Your Customer (KYC) procedures include:

- Verification of business registration and EIN/tax ID
- Validation of customer contact details and website domain
- Internal review of use case or intended call volume
- Denial of service to high-risk or suspicious applicants

We do not offer fully automated sign-up and only activate accounts after manual business verification.

2. Call Monitoring & Abuse Mitigation

Our internal monitoring system includes regular review of:

- Unusually high outbound call volume
- Continual short-duration/failure patterns
- Call frequency and system alerts on nonstandard usage

If suspicious calling activity is detected, a case is immediately opened, and we assess severity. Enforcement steps range from temporary call suspension to full account termination. All such actions are logged for accountability.

3. Traceback & Law Enforcement Cooperation

We are committed to cooperating with all FCC-initiated efforts to investigate suspicious or illegal robocall traffic. Specifically, we:

- Respond to traceback requests from the FCC, law enforcement, or the Industry Traceback Group within 24 hours
- Maintain logs and metadata sufficient to assist with traceback efforts
- Provide full cooperation to stop network abuse and customer misuse

3. STIR/SHAKEN Handling

Blue Sky Phone Solutions, LLC does not implement STIR/SHAKEN directly. All calls originated by our customers are routed through SkySwitch, our upstream provider, who signs outbound traffic in full compliance with 47 CFR § 64.6301(a). We verify that our upstream partner is properly registered in the FCC Robocall Mitigation Database and maintains active STIR/SHAKEN support for all traffic on our behalf.

4. Program Oversight

Robocall mitigation oversight and responsibility within the company are maintained by:

David Fennema

Owner and VoIP Services Administrator

Blue Sky Phone Solutions, LLC

865 E Baseline Rd #1088

Gilbert, AZ 85233

david@blueskyphonesolutions.com

480-299-2662

We review our robocall mitigation activity and tools at least once per calendar year and make adjustments based on changes in regulation or upstream carrier capabilities.

6. Exemption Statement

Blue Sky Phone Solutions, LLC qualifies for exemption from direct STIR/SHAKEN implementation under 47 CFR § 64.6304(a) as we operate fewer than 100,000 subscriber lines and do not own or operate a facilities-based IP network. All outbound voice traffic is signed by our partner carrier, SkySwitch. We maintain full responsibility for customer vetting, usage review, and compliance reporting.