



FRN: 0022434237

Filing Entity: Centuric, LLC

FCC Compliance Contact:

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1. Company Overview

Centuric, LLC is a provider of UCaaS/VoIP services under its own brand. Centuric partners with upstream carriers CoreDial and SkySwitch to deliver call services but maintains direct relationships with end-user customers. Centuric is responsible for ensuring that its operations and its customers comply with the FCC's robocall mitigation rules.

2. STIR/SHAKEN Implementation

Centuric relies on CoreDial and SkySwitch for the technical implementation of Security Telephone Identity Revisited / Signature-based Handling of Asserted Information using toKENs (STIR/SHAKEN) authentication.

All outbound traffic is routed through providers that are listed in the FCC's Robocall Mitigation Database and are required to sign calls appropriately.

Centuric has confirmed that full A/B/C attestation is applied by its upstream providers where applicable.



3. Customer Vetting Procedures

Centuric employs robust Know Your Customer (KYC) checks to prevent unlawful robocallers from obtaining service:

Business Verification: Customers must provide a valid EIN or incorporation documents.

Identity Checks: Customers are required to provide verifiable contact information.

Use Case Review: Customers engaged in high-volume calling operations inconsistent with legitimate business use are denied service.

Terms of Service: All customer agreements explicitly prohibit the origination of unlawful robocalls.

4. Ongoing Monitoring and Enforcement

Centuric monitors traffic to detect and prevent unlawful call activity:

Threshold-Based Monitoring: Centuric reviews customer call volume monthly. If usage exceeds 2,500 minutes per month, the customer's activity is investigated.

Traffic Analysis: Patterns such as sequential dialing, excessive short-duration calls, or abnormal call distribution are flagged for review.

Complaint Response: All robocall complaints are logged, investigated, and addressed promptly.

Enforcement: Accounts found to be generating unlawful robocalls are suspended or terminated.

5. Escalation and Cooperation

Primary Contact: Frank Peluso, CISO, is the designated point of contact for FCC traceback requests, USTelecom Traceback Group inquiries, and upstream carrier complaints.



Escalation Process: Upon receipt of a traceback or complaint, Centuric immediately investigates, documents findings, and takes corrective action.

Industry Cooperation: Centuric cooperates fully with the FCC, traceback authorities, and upstream providers to stop unlawful robocall traffic.

6. Recordkeeping

Centuric maintains detailed records of:

- Customer onboarding documents
- Traffic investigations
- Robocall complaints
- Enforcement actions (suspensions, terminations)

Records are retained for a minimum of 24 months and are available to regulators upon request.

7. Certification

- **Centuric, LLC certifies that:**
- This mitigation plan has been filed in the FCC Robocall Mitigation Database.
- All outbound calls are authenticated by STIR/SHAKEN via its upstream providers.
- Customer vetting, monitoring, and enforcement procedures are actively maintained to prevent unlawful robocall activity.

Signed:

Frank Peluso

Chief Information Security Officer

Centuric, LLC