

Robocall Mitigation Program (RMP)

Version: v1.0 — **Effective Date:** September, 11 2025

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Company & Filing Overview

- Role: Voice Service Provider
 - FCC Registration (FRN): 0037483971
 - Certification: We certify that all calls we originate are subject to this program and that we comply with 47 C.F.R. §64.6305.
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STIR/SHAKEN Implementation

- Status: Fully implemented on all IP portions of our network.
 - Details:
 - We sign outbound SIP calls using ATIS STIR/SHAKEN standards.
 - Attestation levels:
 - A: Verified customer identity and TN authorization.
 - B: Verified identity, TN authority not confirmed.
 - C: Not applicable (we do not act as a gateway).
 - Certificate Management: STI-PA token and STI-CA certificates maintained under secure lifecycle controls.
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Core Mitigation Measures

1. **24-Hour Traceback Response**
 - We respond to traceback requests from the FCC, law enforcement, and the ITG within 24 hours.
2. **Blocking Upon FCC Notification**
 - We block traffic identified in FCC notifications and substantially similar traffic immediately upon notice.
3. **Know-Your-Customer (KYC)**
 - Identity Verification: Government-issued ID or corporate registration, tax ID, and physical address validation.

- Number Authorization: Proof of right-to-use for all TNs (LOAs or provider assignment).
- Use-Case Review: Expected call type, volume, and jurisdiction mix; high-risk use cases receive enhanced scrutiny.
- Contractual Terms: Customers agree to:
 - Prohibit illegal robocalls/spoofing.
 - Cooperate with traceback and blocking directives.
 - Accept immediate suspension for violations.

4. Traffic Monitoring & Enforcement

- Continuous analytics for abnormal patterns (short-duration bursts, invalid CLIs, DNO list hits).
- Progressive enforcement: warning → suspension → termination.

5. Customer Obligations

- Customers must maintain accurate caller ID, comply with U.S. robocall laws, and respond to compliance inquiries within 24 hours.
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Analytics & Redress

- Analytics Tools: Bandwidth.com
 - Redress Process: Dedicated email/web form for callers to dispute erroneous blocking; resolution within 2 business days.
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Recordkeeping

- Retain KYC files, STIR/SHAKEN signing logs, and enforcement actions for at least 24 months.
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Governance & Updates

- Compliance Owner: John Cadigan
 - RMD Updates: Within 10 business days of any change; annual recertification.
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Appendix A — Attestation Policy

- A: Verified identity + TN authority.
- B: Verified identity only.
- C: Not applicable.