

Robocall Mitigation Plan (RMP)

Soar Solutions Group LLC (d/b/a Soar Communication)

FRN: 0037442423 • Provider Role: Voice Service Provider

Version: v1.0 • Date: 2025-09-15

1) Current STIR/SHAKEN Status

As of the filing date, the provider has not implemented STIR/SHAKEN using its own STI-PA SPC token/certificate. The provider will pursue eligibility for an SPC token and, once obtained, will ensure all originated calls are authenticated with the provider's certificate (either directly or via a vendor signing with the provider's cert). The RMD filing will be updated upon implementation.

2) Reasonable Steps to Prevent Illegal Robocalls (47 CFR § 64.6305(a))

- **KYC Onboarding:** Verify legal entity (EIN/registration), beneficial ownership, physical address, website/domain reputation, intended use cases, authorized caller IDs/DIDs; require acceptance of AUP/anti-abuse terms.
- **Traffic Monitoring & Analytics:** Track ASR/ACD, short-duration ratios, CPS surges, sequential/neighbor-spoof patterns; alert on anomalies; block/limit suspicious traffic at tenant/trunk/destination levels.
- **Caller-ID Controls:** Permit only assigned/authorized numbers; prohibit spoofing/misrepresentation and calls to known Do-Not-Originate ranges.
- **Complaints Handling:** Monitor the abuse mailbox; triage within 1 business day; correlate complaints with CDRs and recordings (if available) and remediate as needed.
- **Traceback Cooperation:** Commit to respond fully within 24 hours to Commission, law enforcement, and the Industry Traceback Group requests.
- **Enforcement:** Progressive actions—warning → rate limiting → feature restrictions → temporary suspension → termination for violations.
- **Recordkeeping:** Retain KYC/provisioning logs, authorized caller-ID attestations, analytics/alerts, and abuse tickets for 24 months.
- **Upstream/Downstream Diligence:** Use upstream carriers listed in the RMD; require downstream partners/customers to be compliant; suspend if non-compliant.

3) Contacts

Compliance/RMD: Todd Weikle, Director of Operations — todd.weikle@soarcommunication.com — Phone: [ADD PHONE]

24-hour Traceback: Todd Weikle (or designated on-call) — todd.weikle@soarcommunication.com — Phone: [ADD 24/7 PHONE]

Technical/NOC: [Name/Title] — [NOC email] — Phone: [ADD PHONE]

4) Certification

The provider certifies that this robocall mitigation program is implemented and actively enforced across all originated traffic, and that it will be updated within 10 business days of any material change (e.g., contacts, status, roles).

Appendix A — Rule Citation & Explanation for Option 3

Rule: 47 C.F.R. § 64.6304(b) (SPC-token access exemption).

Explanation: The provider is currently ineligible to obtain an STI-PA SPC token under Governance Authority criteria; therefore, its § 64.6301 STIR/SHAKEN implementation obligation is deferred until it is capable of obtaining a token. The provider will pursue eligibility and implement STIR/SHAKEN using its own certificate and will update its RMD certification at that time. In the interim, all originated calls are subject to this Robocall Mitigation Program, and the provider commits to 24-hour traceback cooperation.

Note: Replace bracketed items (e.g., [ADD PHONE]) with your actual contact info. You may also mirror these contacts in the RMD portal's contact fields.