

# **LIGHTHOUSE IT, INC.**

## **ROBOCALL MITIGATION PLAN**

Lighthouse IT, Inc. (Lighthouse IT) is a small Managed Service Provider based in Texas focused on supporting small businesses. Although the company does not seek to expand or grow telecommunications services to provide to its customers, the company does have a small number of customers who have requested telecommunications services.

Lighthouse IT is registered with the Federal Communications Commission (“FCC”) and holds the 499 Filer ID number of 833108. The Company’s FRN/CORESID Number is 0028458727.

### **THE COMPANY PRIMARY PLACE OF BUSINESS**

1212 Marlandwood Rd  
Temple, Texas 76502  
Phone: 254-774-9035  
<https://lighthouseit.us>  
[seethelight@lighthouse.us](mailto:seethelight@lighthouse.us)

### **LEADERS OF THE COMPANY ARE:**

#### **CEO**

Name: Ray Wilson  
Address: 1212 Marlandwood Rd  
City, State and Zip: Temple, Texas 76502  
Email: [ray.wilson@lighthouseit.us](mailto:ray.wilson@lighthouseit.us)  
Direct Dial: (254) 266-6420

#### **DESIGNATED RMD CONTACT:**

Name: Ray Wilson  
Address: 1212 Marlandwood Rd  
City, State and Zip: Temple, Texas 76502  
Email: [ray.wilson@lighthouseit.us](mailto:ray.wilson@lighthouseit.us)  
Direct Dial: (254) 266-6420

### **STIR/SHAKEN COMPLIANCE**

As a switchless reseller Lighthouse IT does not own its own network or infrastructure of any kind and therefore has no access to any IP portion of any call and/or a SIP header of any call. In this case the company, pursuant to the FCC Exemption as found in the FCC Order related to STIR/SHAKEN and Robocall Mitigation is exempt from the STIR/SHAKEN obligation.

## **TRACEBACK**

Lighthouse IT commits to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robo-callers from using the Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

## **KNOW YOUR CUSTOMER**

The Company is provided with data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement by its platform provider and underlying carrier. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- Through its MSP business Lighthouse IT, when the company commences operations with a customer, the company verifies all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.
  - Lighthouse IT supports its core business as an MSP. Only if and when an existing business client requests telecommunications services the company will support such a request on a discretionary basis. And the company has a strong relationship, understanding and knowledge of its customer(s).
  - At no time does the company seek out new customers specific only to

telecommunications services as a stand-alone product(s) and will never market services in.

### **UPSTREAM PROVIDERS**

The provisioned platform from OIT, LLC serves as the upstream provider for the company who provides platform and services to Lighthouse IT for the company to support a switchless reseller model. Since the company does not have its own infrastructure and has no access to any IP portion of any call or the SIP header of the call, OIT provides all underlying support.

OIT, LLC (dba Orsini IT, LLC)  
15450 New Barn Road  
Suite 200 #1001  
Miami Lakes, FL 33014  
Toll Free: 844.CALL.OIT  
Local: 305.967.6756  
Email: [support@oit.co](mailto:support@oit.co)

The Company (as a switchless reseller) by its underlying platform provider reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected.

The Company (as a switchless reseller) by its underlying platform provider is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

### **COMPANY DECLARATION**

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.