

Robocall Mitigation Program Description – Reseller

Company Name: Acuative Corporation

FCC Registration Number (FRN): 0025413709

Filer Role: Reseller (Non-Facilities-Based Provider)

1. Role as a Reseller

Acuative Corporation operates strictly as a **reseller** of voice services and does not originate calls on its own network. All voice traffic is provisioned through underlying upstream carriers who are responsible for originating, signing (with STIR/SHAKEN when applicable), and transmitting voice calls.

2. STIR/SHAKEN Compliance

As a reseller, Acuative Corporation does **not originate SIP calls** and, therefore, does **not implement STIR/SHAKEN directly** on any IP-based voice traffic. However, we:

- **Only interconnect with upstream providers** that are registered in the FCC’s Robocall Mitigation Database and are **STIR/SHAKEN-compliant** or have filed an appropriate robocall mitigation plan.
 - **Ensure that our upstream providers** used for originating or terminating calls are compliant with all applicable FCC robocall mitigation regulations. Acuative Corporation’s upstream providers include: AT&T Solutions, Verizon Communications, T-Mobile, Comcast, Spectrum/Charter, Intelpeer, and Granite Telecommunications.
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3. Robocall Mitigation Practices

Even though we do not originate calls, Acuative Corporation has implemented the following **robocall mitigation practices** to prevent the origination and transmission of illegal robocalls:

- **Know Your Customer (KYC):** We conduct due diligence on all customers, including:
 - Business verification (EIN, registration, contact information).
 - Traffic profile review to assess risk of high-volume or suspicious traffic.
 - Cross-checking customer information against known bad actor lists or industry blacklists.
 - **Traffic Monitoring:**
 - We regularly **review call detail records (CDRs)** and traffic patterns for anomalies that could indicate robocall activity.
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- We flag and investigate unusual call volumes, short-duration calls, or high calls-per-second (CPS) rates.
 - **Complaint Investigation:**
 - We promptly investigate any complaints or traceback requests received from the **Industry Traceback Group (ITG)** or other authorities.
 - We maintain policies to **suspend or terminate** customers found to be originating or facilitating illegal robocalls.
 - **Cooperation with Law Enforcement and Industry:**
 - We fully cooperate with the ITG, FCC, and other relevant enforcement bodies in identifying and responding to suspected illegal robocall sources.
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4. Contact Information for Robocall Mitigation

Designated Contact Person:

Joe Jean
Solutions Architect
440-202-4507
jjean@acuative.com

5. Certification

Acuative Corporation certifies that it has implemented these robocall mitigation practices in accordance with the FCC's rules and will update this plan as required.