

Robocall Mitigation Program – Business Data Services

1. Company Overview

Business Data Services is a U.S.-based **voice service provider** under 47 CFR § 64.6300(n). We provide VoIP-based business communications services to end users, including PBX systems and hosted voice platforms.

We deliver services through **SkySwitch**, our domestic upstream provider. SkySwitch is the carrier-of-record and holds the numbering resources used to provision telephone numbers. SkySwitch is responsible for originating traffic onto the public switched telephone network (PSTN) and for implementing and maintaining STIR/SHAKEN call authentication.

As a result, Business Data Services does **not have a direct STIR/SHAKEN obligation**, but we file this Robocall Mitigation Program as required by 47 CFR § 64.6305(d)(ii)-(iii).

2. Robocall Mitigation Practices

Customer Vetting (Know Your Customer – KYC)

- All customers must be verified as legitimate businesses before services are activated.
- We require valid company information and service agreements.
- Accounts suspected of being fraudulent are denied service.

Prohibited Use Policies

- Our Terms of Service explicitly prohibit illegal robocalling, spoofing, or fraudulent activity.
- Customers must agree to these terms prior to activation.

Ongoing Monitoring

- We monitor usage patterns for suspicious activity, including:
 - High-volume call bursts
 - Short-duration traffic patterns
 - Complaints of spam or fraudulent activity

- We review customer call activity when flagged by automated systems, end-user complaints, or upstream provider notices.

Enforcement

- If illegal or suspicious activity is detected, we investigate immediately.
- Accounts in violation are suspended or terminated.
- We cooperate fully with SkySwitch, traceback organizations, and law enforcement in resolving incidents.

3. Traceback Cooperation

Business Data Services responds promptly to traceback requests from the **Industry Traceback Group (ITG)** and government authorities. We have designated a compliance contact to ensure timely cooperation.

4. STIR/SHAKEN Responsibility

- Business Data Services does not originate calls onto the PSTN and does not hold numbering resources.
- All outbound calls are authenticated and signed with STIR/SHAKEN by our upstream provider (SkySwitch).
- Our role is to ensure our customers comply with legal and contractual requirements and do not misuse our platform for robocalls.

5. Compliance Contact

Name: Tito Huynh

Title: Vice President

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6. Certification Statement

This Robocall Mitigation Program is submitted in compliance with **47 CFR § 64.6305(d)(ii)-(iii)**. As a voice service provider that serves end users but does not directly hold numbering resources or originate calls onto the PSTN, Business Data Services has **no STIR/SHAKEN obligation**. Our upstream provider (SkySwitch) performs STIR/SHAKEN call authentication on all traffic.

We remain committed to preventing illegal robocalls, enforcing customer compliance, and cooperating with traceback and enforcement authorities.