

Robocall Mitigation Program Description

Company Name: INC Systems

Exemption Statement

The filer is exempt from STIR/SHAKEN implementation obligations pursuant to the FCC's Eighth Report and Order on Call Authentication (released November 22, 2024), which clarifies that only voice service providers (VSPs) with control over the SIP signaling and network infrastructure necessary to sign calls are subject to STIR/SHAKEN compliance requirements.

As a reseller of CoreDial, the filer does not originate calls directly and does not control the network infrastructure required to implement STIR/SHAKEN. Therefore, the filer is not obligated to obtain an SPC token or sign calls using its own certificate. Instead, CoreDial, the upstream provider, is responsible for authenticating calls and assigning attestation levels in accordance with FCC rules.

This exemption is supported by the FCC's clarification that VSPs lacking technical control over call authentication remain exempt from both STIR/SHAKEN and the Third-Party Rule requirements. The filer will submit a robocall mitigation plan and comply with all applicable obligations for non-STIR/SHAKEN providers.

Robocall Mitigation Practices

The filer has implemented the following practices to mitigate illegal robocalls:

- Know Your Customer (KYC) procedures to verify the identity and legitimacy of clients.
- Monitoring of call traffic patterns to detect and prevent suspicious activity.
- Immediate response to traceback requests from the FCC and industry traceback group.
- Contractual obligations with customers prohibiting illegal robocall activity.
- Cooperation with upstream provider CoreDial to ensure proper call authentication and attestation.

Confidentiality Notice

The filer requests that certain contents of this filing be kept confidential and has submitted a confidentiality request in the FCC's Electronic Comment Filing System (ECFS).