

Robocall Mitigation Program Description

True Ingenuity Consulting, LLC

1. Introduction

True Ingenuity Consulting, LLC (“the Company”) is a VoIP services provider offering cloud PBX, SIP services, and unified communications to business customers across the United States. As required by the FCC under 47 CFR § 64.6305, the Company maintains a comprehensive Robocall Mitigation Program designed to prevent, detect, and respond to unlawful robocalling activities originating from or passing through its network.

The Company is committed to safeguarding the telecommunications ecosystem, protecting consumers from unwanted and illegal calls, and maintaining full compliance with FCC authentication and mitigation regulations.

2. STIR/SHAKEN Status

True Ingenuity Consulting utilizes the white-label VoIP infrastructure and softswitch platform provided by SkySwitch, which operates a fully compliant STIR/SHAKEN framework.

SkySwitch fully manages all STIR/SHAKEN certificates, SPC tokens, signing infrastructure, and attestation controls. True Ingenuity Consulting applies Attestation Level A to all verified outbound calls.

3. Robocall Mitigation Practices

True Ingenuity Consulting maintains a layered mitigation framework combining its internal controls with the technical enforcement capabilities of SkySwitch.

3.1 Customer Vetting (KYC)

Before enabling outbound calling, True Ingenuity verifies the business identity, EIN, authorization to use phone numbers, calling use cases, and assesses high-risk verticals. Customers must sign the Acceptable Use Policy (AUP) and Robocall Compliance Agreement.

3.2 Traffic Monitoring & Analytics

True Ingenuity uses internal monitoring and SkySwitch analytics to detect abnormal calling patterns such as high call volume bursts, low call duration, invalid number calls, or sudden traffic shifts.

3.3 Call Blocking, Rate Limiting & Enforcement

Upon detection of suspicious activity, True Ingenuity may block calls, rate-limit traffic, suspend accounts, or coordinate with SkySwitch to stop traffic at the softswitch level.

3.4 Complaint & Traceback Response

The Company responds to traceback requests within 24 hours and investigates customer complaints within one business day. True Ingenuity cooperates fully with SkySwitch and the USTelecom Industry Traceback Group (ITG).

3.5 Data Retention

True Ingenuity maintains customer identity documentation, CDRs, logs, and mitigation records for a minimum of 24 months.

3.6 High-Risk Use Cases

High-volume or automated callers undergo enhanced vetting, monitoring thresholds, and may require pre-approval of campaigns.

4. Cooperation with the Industry Traceback Group (ITG)

True Ingenuity fully cooperates with the USTelecom ITG, providing call path details, customer information, and assisting SkySwitch with traceback analysis.

5. Internal Governance & Oversight

Compliance responsibilities include customer onboarding, monitoring, documentation, policy updates, and traceback coordination.

6. Program Certification

True Ingenuity certifies that it:

- Uses SkySwitch's fully managed STIR/SHAKEN deployment
- Applies Attestation Level A
- Implements effective robocall mitigation
- Monitors traffic in real time
- Cooperates fully with ITG
- Retains records for at least 24 months
- Complies with FCC 47 CFR § 64.6305

7. Contact Information

Robocall Mitigation Compliance Officer

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