

ROBOCALL MITIGATION PLAN (RMD)

ECHONET COMMUNICATIONS LLC

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1. Company Overview

ECHONET COMMUNICATIONS LLC is a U.S.-based telecommunications service provider offering VoIP and related communication services to small and mid-sized businesses. Our operations include call routing, termination, number provisioning, and interconnection with upstream carriers.

We strictly comply with the FCC's rules under 47 CFR §64.1200, the TRACED Act, STIR/SHAKEN requirements, and all industry best practices to prevent the origination and transport of illegal robocalls on our network. Our business model does not rely on high-volume automated dialing, and we do not knowingly serve call centers or customers engaged in abusive practices.

2. Robocall Mitigation Program Summary

ECHONET COMMUNICATIONS implements a multi-layered mitigation framework that includes:

- Strict onboarding and verification of all customers
- Active and automated traffic monitoring
- Real-time anomaly detection and call-pattern analysis
- Immediate suspension protocols for suspicious behavior
- Full STIR/SHAKEN implementation on IP traffic
- 24/7 response team for complaints, traceback, and FCC inquiries

Our objective is clear: ensure that no unlawful robocall traffic originates from, transits through, or is terminated by our network.

3. Know-Your-Customer (KYC) & Onboarding Controls

3.1 Verification Requirements

Every client must undergo mandatory identity and business verification before activation. This includes:

- Government-issued ID (for individuals)
- State business registration documents
- EIN/Tax ID verification
- Corporate address validation
- Active website/domain verification
- Contact details cross-checked with public databases
- Screening against known bad-actor lists (FTC, FCC, YouMail PIR, STIR/SHAKEN fraud lists)

We reject customers without a verifiable business presence or those associated with high-risk industries (tech support scams, crypto recovery scams, refund scams, IRS/SSA impersonation, etc.).

3.2 Traffic Intent Declaration

Customers must submit a written description of:

- The nature of their campaigns or call usage
- Types of calls (transactional, informational, customer support, etc.)
- Estimated call volumes, destinations, and patterns

Any inconsistencies trigger manual review before service is enabled.

4. STIR/SHAKEN Implementation

4.1 Call Authentication

ECHONET COMMUNICATIONS supports full STIR/SHAKEN on all IP-based traffic. We authenticate calls with:

- **A-Level Attestation** – when the caller ID belongs to the customer, and we have full KYC
- **B-Level Attestation** – when the user is verified but cannot be given direct caller ID ownership
- **C-Level Attestation** – transit-only traffic (limited and heavily monitored)

4.2 Certificate Management

All certificates are maintained through the approved STI-PA and STI-CA ecosystem. Key rotation, revocation, and auditing are managed by our Operations Department.

5. Traffic Monitoring & Enforcement

5.1 Automated Monitoring

We use real-time analytics to track:

- Short-duration call spikes
- High SHAKEN C-level ratios
- Traffic bursts are inconsistent with the declared usage
- High answer-rate mismatches
- Excessive call attempts to a single destination
- Repetitive call patterns are common in illegal robocalls

Alerts are pushed to the Operations team for immediate review.

5.2 Manual Review

If traffic seems abnormal, the account is flagged, and calls may be:

- Rate-limited
- Temporarily blocked
- Investigated with direct customer contact

5.3 Complaint Handling

We monitor the following channels:

- FCC consumer complaints
- FTC complaint database
- Upstream provider or carrier feedback
- Direct complaints received by our support team
- Industry traceback requests (USTelecom ITG)

All complaints are investigated within 24 hours.

6. Remediation & Enforcement Policy

6.1 Suspension Criteria

We suspend traffic instantly if:

- A traceback request indicates illegal traffic
- We receive verified scam or impersonation reports
- The customer provides misleading or false onboarding information
- Traffic violates the declared intent or STIR/SHAKEN rules

6.2 Termination Criteria

A customer is permanently terminated if:

- They are confirmed to originate illegal robocalls
- They fail to provide the requested evidence within 24 hours
- They attempt to circumvent monitoring systems
- They use numbers for fraud, spoofing, or impersonation

We maintain full logs and evidence for compliance and regulatory audit purposes.

7. Traceback Cooperation

ECHONET COMMUNICATIONS fully cooperates with:

- The USTelecom Industry Traceback Group (ITG)
- FCC Enforcement Bureau
- Upstream and downstream carriers

Upon receiving a traceback request:

- We respond within 24 hours
- Provide call logs, customer information, and traffic sources
- Immediately block problematic traffic, even before final determination

8. Network Security & Spoofing Prevention

8.1 Number Usage Verification

Caller IDs must be:

- Owned by the customer
- Leased through our platform
- Verified with LOA or documentation

Unauthorized use triggers immediate blocking.

8.2 API & SIP Security

We enforce:

- IP whitelisting
- Authentication tokens
- SIP TLS and SRTP where supported
- Rate limiting and fraud-detection heuristics

8.3 Automated Call Behavior Control

Dialer-type traffic is only permitted with:

- Documented consent
- Proper opt-out mechanisms
- Legal campaign classification

We prohibit high-volume auto-dialing without legitimate business justification.

9. Recordkeeping

We maintain logs for at least 24 months, including:

- Call detail records (CDRs)
- STIR/SHAKEN attestation details
- Customer identity and onboarding documentation
- Complaint responses and traceback communications

10. Organisational Responsibility

Robocall Mitigation Officer

Toliver Grier – President, Operations

ECHONET COMMUNICATIONS LLC

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He oversees:

- STIR/SHAKEN compliance
- KYC processes
- Traffic monitoring and enforcement
- Regulatory communication
- Carrier escalation and investigations

11. Certification Statement

ECHONET COMMUNICATIONS LLC certifies that it has implemented a comprehensive robocall mitigation program consistent with FCC requirements. Illegal robocall origination is strictly prohibited. Violations result in immediate suspension and termination of service.

We ensure that our network, customers, and upstream partners remain compliant with all federal and industry anti-robocalling standards.