

Eugene Networks
Robocall Mitigation Program Description
Effective Date: November 24, 2025

1. Provider Overview

Eugene Networks is a U.S.-based voice service provider offering hosted VoIP and cloud phone services to small and medium-sized business customers. Eugene Networks does not market to high-volume telemarketing or lead-generation call centers. Service is delivered using upstream carrier partners, including Viirtue and CoreDial / BCM One, which provide PSTN connectivity and implement STIR/SHAKEN on calls originated by Eugene Networks' customers where technically feasible.

Eugene Networks does not operate as a gateway provider or non-gateway intermediate provider.

2. STIR/SHAKEN Status

Eugene Networks does not control the underlying network infrastructure needed to directly deploy STIR/SHAKEN. Instead, we rely on our upstream carriers, including Viirtue and CoreDial, which are responsible for STIR/SHAKEN call authentication and signing. Eugene Networks does not offer any configuration that would bypass or disable STIR/SHAKEN on their networks.

3. Robocall Mitigation Measures

Eugene Networks maintains a robocall mitigation program designed to prevent the origination of illegal robocalls, consistent with 47 CFR § 64.6305(d)(2)(ii)–(iii). Core elements include:

a. Know-Your-Customer (KYC)

Before enabling voice service for any new customer, and on renewal or material change of service, we:

- Collect and verify the customer's legal business name, physical address, tax ID, primary contacts, and basic business description.
- Review website and online presence to confirm the nature of the business.
- Assess whether the customer's intended calling patterns are consistent with normal business use (e.g., staff phones, appointment reminders, support lines).
- Screen out high-risk use cases such as large-scale outbound telemarketing, lead-generation operations, and other categories commonly associated with illegal robocalls.

Eugene Networks reserves the right to refuse service or terminate existing service if a customer's use presents an unacceptable risk of illegal robocall traffic.

b. Know-Your-Upstream-Providers

Eugene Networks procures PSTN access and numbering only from established upstream carriers, including Viirtue and CoreDial / BCM One, which are registered in the FCC's Robocall Mitigation Database and maintain their own robocall mitigation and STIR/SHAKEN programs. We do not accept traffic from unknown or unvetted upstream providers.

c. Traffic Monitoring and Complaint Handling

Using carrier portals and internal tools, Eugene Networks reviews customer traffic for:

- Sudden or unexplained spikes in call volume;
- High percentages of very short-duration calls;
- Unusual calling patterns or high concentration of calls to specific ranges;
- External complaints or traceback notices.

When suspicious activity is identified, Eugene Networks may:

1. Investigate call detail records and customer information;
2. Contact the customer for explanation and supporting documentation (such as consent records, where applicable);
3. Apply rate limits, blocks, or other technical controls; and/or
4. Suspend or terminate service where we reasonably believe traffic is associated with illegal robocalls.

We maintain a public point of contact (phone and/or email) for complaints related to suspected illegal or unwanted calls and follow a similar investigative and remediation process for all such complaints.

4. Traceback Cooperation

In accordance with 47 CFR § 64.6305(d)(2)(iii), Eugene Networks commits to respond within 24 hours to traceback requests from the FCC, law enforcement, and the designated industry traceback consortium, and to fully cooperate in identifying the source of suspected illegal traffic and preventing its continuation.

Traceback and robocall mitigation contact:

Name: Nathan Martin

Title: CEO

Company: Eugene Networks

Address: 1292 High Street PMB 221 Eugene, OR 97401

Phone: 541-600-3777

Email: nathan@eugenetworks.com

5. Ongoing Review

Eugene Networks will periodically review and update this robocall mitigation program to reflect changes in FCC requirements, industry best practices, and our service offerings,

and will update its Robocall Mitigation Database filing in a timely manner if material information changes.