
Robocall Mitigation Plan (RMP)

Eleven Solutions LLC

Updated and Fully Compliant Statement

Eleven Solutions LLC hereby submits this Robocall Mitigation Plan in compliance with the regulations and orders issued by the **Federal Communications Commission (FCC)**, including the requirements established under 47 CFR § 64.6305 and related STIR/SHAKEN and robocall mitigation obligations.

This document accurately reflects our operational practices and aligns with our current Robocall Mitigation Database (RMD) filing.

1. STIR/SHAKEN Implementation

Eleven Solutions LLC maintains a **fully implemented STIR/SHAKEN framework** and independently signs outbound calls under our authorized Service Provider Code (SPC) token credentials.

Our implementation includes:

- Direct authentication and signing of outbound calls
- Application of appropriate A, B, or C attestation levels based on verified customer relationships
- Secure certificate management through an approved STI Certificate Authority
- Compliance with governance standards established by the **Secure Telephone Identity Governance Authority (STI-GA)**
- Ongoing maintenance of authentication infrastructure in accordance with FCC mandates

Attestation levels are assigned internally based on documented KYC/KYB verification, customer relationship status, and authorized use of numbering resources.

2. Provider Role

Eleven Solutions LLC operates as an **originating service provider and reseller**. We originate calls on behalf of verified business customers using properly assigned numbering resources.

We do **not** operate as a gateway provider and do not transmit unauthenticated foreign-originated traffic directly into the U.S. PSTN.

3. Traffic Monitoring and Analytics

Eleven Solutions LLC actively monitors traffic using both internal systems and upstream carrier analytics. Monitoring includes, but is not limited to:

- Answer Seizure Ratio (ASR)
- Average Call Duration (ACD)
- Calls Per Second (CPS) thresholds
- Post Dial Delay (PDD)
- Call volume pattern analysis
- Customer complaint tracking
- Traceback notifications and industry alerts

Automated and manual review mechanisms are in place to identify abnormal traffic patterns, suspicious call behavior, or regulatory red flags. Any anomaly triggers immediate internal investigation and, where necessary, suspension of traffic pending review.

4. Know Your Customer (KYC) / Know Your Business (KYB)

All customers undergo mandatory verification prior to activation. Verification procedures include:

- Business registration documentation
- Verification of authorized signatory
- Physical business address validation
- Disclosure of intended traffic use case
- Review of marketing practices and call consent methodology
- Execution of Master Service Agreement and Acceptable Use Policy

Enhanced due diligence is conducted for high-volume or higher-risk traffic profiles. Additional documentation may be required prior to approval.

5. Acceptable Use Policy (AUP)

All customers are contractually bound to an Acceptable Use Policy that strictly prohibits:

- Illegal robocalls
- Spoofing or falsified caller ID
- Non-consensual calling
- Misleading or fraudulent traffic
- Any violation of federal or state telecommunications laws

Violations result in immediate enforcement action as outlined below.

6. Enforcement Policy

Eleven Solutions LLC maintains a zero-tolerance policy toward illegal robocalling and non-compliant traffic.

Enforcement measures include:

- Written warning for minor first-time violations
- Immediate suspension of traffic upon credible evidence of illegal activity
- Permanent termination for confirmed or repeated violations
- Blocking of associated numbering resources where required
- Reporting to upstream carriers or authorities when appropriate

All enforcement actions are documented internally.

7. Traceback Cooperation

Eleven Solutions LLC fully cooperates with traceback and enforcement requests from:

- The **Federal Communications Commission (FCC)**
- Law enforcement agencies
- Authorized industry traceback consortiums

We commit to responding to all traceback requests within **24 hours** and to taking immediate action to mitigate, suspend, or terminate traffic associated with illegal robocalling.

8. Ongoing Compliance Commitment

Eleven Solutions LLC continuously reviews its policies, monitoring systems, and compliance procedures to ensure adherence to evolving FCC rules and industry best practices.

This Robocall Mitigation Plan is submitted as part of our official RMD filing and represents our good-faith commitment to maintaining a secure, compliant, and authenticated voice network.