

JCM Telecom LLC

Robocall Mitigation Plan

JCM Telecom LLC is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using its service to originate calls or transit calls into the United States and territories.

JCM Telecom LLC is a reseller of PayG LLC dba SkySwitch (RMD0002940) (referred to below as “the Company”) and does not have the capability to implement STIR/SHAKEN. PayG LLC dba SkySwitch has implemented STIR/SHAKEN protocols in its IP Voice network.

JCM Telecom LLC has not been prohibited from filing a certification in the Robocall Mitigation Database.

JCM Telecom LLC, nor any of its executives or principals, has a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

JCM Telecom LLC and the Company commit to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using the Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, the Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis unless the Company’s investigation determines that the traffic is not illegal. If the Company determines that the identified traffic is not illegal, the Company shall provide the Enforcement Bureau with an explanation as to why the Company reasonably concluded that the identified traffic is not illegal and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes, and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns and originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling. In addition, JCM Telecom LLC follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

These practices include monitoring the network to identify suspicious traffic patterns, limiting customer capacity via call-per-second and/or concurrent session limits, and regularly checking call patterns for possible abusive traffic.

All new customers are verified using a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. JCM Telecom LLC severely limits the capabilities of new accounts until these processes are complete.

JCM Telecom LLC utilizes the following hosted VoIP platform:

PayG LLC dba SkySwitch Arborcrest 1 751 Arbor Way, Suite 150 Blue Bell, PA 19422 Phone: 747-777-8100
Email: support@skyswitch.com

JCM Telecom LLC and the Company reserve the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or not authorized has occurred or is suspected. The Company may block originating numbers, terminating numbers, trunks, or customers, including termination of the customer relationship, to prevent robocalling, invalid originating numbers, or spoofed origination numbers

transiting the Company's networks.

Any call originated on the JCM Telecom LLC network is subject to inspection and investigation if suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. Repeated or excessive violations may result in disconnection from the JCM Telecom LLC network and may be subject to investigation, fines, or penalties imposed by the FCC or jurisdictional courts under the TRACED Act.