

**PEAKE Technology Partners, LLC**

**Robocall Mitigation Plan**

## **Introduction**

This document details the reasonable steps and actions taken by PEAKE Technology Partners, LLC (“PEAKE” or the “Company”) to mitigate and eliminate illegal robocalling. PEAKE has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

PEAKE is a US domestic voice service provider that provides PSTN-connected IP telephony services to enterprise end users.

## **STIR/SHAKEN**

PEAKE is fully STIR-SHAKEN implemented. All calls originating on PEAKE’s network are signed using the STIR/SHAKEN framework in the Company’s switching equipment. PEAKE assigns “attestation A” to nearly all calls due to our ownership of the relevant source telephone numbers and the Company’s direct relationship with the calling party. In the case of call forwarding from off-net sources, PEAKE assigns “attestation C” to the call. PEAKE’s OCN and service provider code is OCN-897L.

## **Know Your Underlying Provider**

PEAKE has master service agreements with our upstream providers, has received written assurances from their officials that it, and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to PEAKE. PEAKE and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

## **Know Your Customer**

Customers on PEAKE’s network are managed by PEAKE’s IT service division. Voice services are provided as hosted PBX services to end-users under the management of PEAKE. This architecture makes it difficult or impossible for any fraudulent activity to occur, since PEAKE (a) is intimately familiar with the Company’s customers’ business operations and practices, and (b) have technical safeguards in place to prevent high-volume outbound calling and caller ID spoofing. Customer contracts include an acceptable use policy that prohibits illegal activity.

## **Active Monitoring**

PEAKE's network is equipped with automated alerting for suspicious activity such as changes in outbound call volume and unusual calling activity (international destinations, for example). Additionally, manual reviews are conducted regularly to identify the cause of any suspicious behavior.

## **Traceback Requests**

PEAKE is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. PEAKE will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Company Traceback Contact:

Kevin Breckenridge  
Sr. Director of Technology  
(301) 927-1511

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, PEAKE immediately begins rejecting all traffic from the offending customer.

## **Telephone Numbers**

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by PEAKE and/or obtained by the Company from PEAKE's underlying carrier for use by the subscriber. Numbers can also be allocated by PEAKE or ported using information from previous bill matching customer information.

## **International Calling**

PEAKE is not currently an international voice services provider. If at any time PEAKE does decide to sell our services to international customers using North American Numbering Plan resources, the Company will familiarize itself with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

## **Call Analytics**

PEAKE does not perform call analytics.

## **Ongoing Robocall Mitigation**

PEAKE monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

## **PEAKE Contact for Robocall Mitigation-Related Issues**

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Kevin Breckenridge  
Sr. Director of Technology  
PEAKE Technology Partners, LLC  
5041 Howerton Way, Suite A  
Bowie, MD 20717  
(301) 927-1511  
[kbreckenridge@peaketechnology.com](mailto:kbreckenridge@peaketechnology.com)

Please note that no STIR/SHAKEN exemptions or extensions are claimed for this business. Additionally, no actions to bar our business from the RMD have been taken. Finally, we are not subject to any regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.