

Robocall Mitigation Program Description

Filer Type: Enterprise Application Provider (Non-Carrier)

1. Overview of Operations

The filer operates an enterprise software application that initiates automated, non-telemarketing, informational voice alerts to end users. These alerts are used solely to notify individuals regarding job-related timing matters (e.g., warnings that an individual is late to a scheduled job). The filer does not provide voice service to the public or to other carriers.

All voice calls are placed using third-party, FCC-regulated voice service providers. The filer does not operate a voice network, does not control call routing or termination, does not assign or manage telephone numbering resources, and does not interconnect with the public switched telephone network as a carrier.

2. STIR/SHAKEN Applicability

The filer is not a “voice service provider” as defined in 47 CFR §64.6300 and therefore is not subject to the STIR/SHAKEN authentication requirements set forth in 47 CFR §64.6301. The filer does not originate calls as a carrier and does not perform call authentication or signing. Responsibility for STIR/SHAKEN implementation rests entirely with the upstream voice service providers used by the filer.

3. Robocall Mitigation Practices

Although not subject to carrier-level robocall mitigation requirements, the filer employs reasonable practices to prevent unlawful or abusive calling, including:

- Calls are informational and transactional in nature only; no telemarketing or solicitation calls are made.
- Calls are initiated only for individuals associated with active job assignments.
- Call frequency is limited and directly tied to job-related events.
- The filer maintains contractual relationships with upstream voice service providers that are responsible for compliance with FCC robocall mitigation and traceback obligations.
- The filer cooperates fully with any lawful inquiries from its upstream providers related to traceback or investigation of calls initiated through the platform.

4. Traceback Cooperation

If contacted by an upstream voice service provider, law enforcement, or an authorized traceback consortium through the filer's carrier, the filer will cooperate promptly and provide relevant application-level information necessary to support investigation of any suspected unlawful robocall activity.

5. Certification

The filer certifies that the information provided herein is accurate and that the filer does not operate as a voice service provider, gateway provider, or intermediate provider within the meaning of 47 CFR §64.6305.