

Robocall Mitigation Program Description

Company Name: CallONet

Overview

CallONet is committed to preventing the origination and transmission of illegal robocalls across its network. This Robocall Mitigation Program (RMP) describes the policies, procedures, and technical measures implemented by CallONet to ensure compliance with FCC requirements and to protect consumers and downstream providers.

STIR/SHAKEN Implementation

CallONet implements the STIR/SHAKEN framework on its IP-based voice network to authenticate and verify caller ID information. All eligible outbound calls are signed using appropriate attestation levels based on CallONet's relationship with the calling customer and knowledge of the caller's right to use the calling number.

Robocall Mitigation Measures

- Know Your Customer (KYC) and Customer Due Diligence (CDD) procedures prior to service activation.
- Traffic monitoring and analytics to identify suspicious or anomalous calling patterns.
- Blocking or suspending traffic associated with illegal robocalls or spoofed caller ID.
- Prompt investigation of traceback requests and complaints from regulators, industry partners, or consumers.
- Termination of service for customers found to be in violation of robocall laws or CallONet policies.

Complaint Handling and Enforcement

CallONet maintains procedures to receive, track, and respond to robocall complaints. Complaints are reviewed promptly, and appropriate enforcement actions are taken, including call blocking, customer notification, and service suspension or termination when required.

Ongoing Compliance

CallONet regularly reviews and updates its robocall mitigation practices to align with FCC rules and industry best practices. Employees and relevant partners are trained on robocall compliance obligations to ensure continued effectiveness of this program.

This Robocall Mitigation Program is maintained in accordance with FCC requirements and is subject to updates as regulations or operational practices evolve.

We are committed to responding to all traceback requests received from authorized parties within 24 hours of receipt.