

Convergent Telecom - Robocall Mitigation Plan

Introduction

Convergent Telecom, Inc. (CT) is a Voice Service Provider (VSP) operating as a reseller of the SkySwitch (a BCM One company) and Viirtue platforms. This document outlines our comprehensive program to mitigate the origination of illegal robocalls on our network, as required by [47 C.F.R. § 64.6305](#).

Know Your Customer (KYC) & Vetting

CT serves as the primary relationship holder for all end-users. We mitigate robocalling at the point of entry through:

- **Identity Verification:** We collect and verify the legal business name, physical address, and EIN for every new commercial customer.
- **Traffic Review:** During onboarding, customers must disclose their intended use case. We do not support high-volume dialers, telemarketing firms, or "robocalling" traffic.
- **Contractual Enforcement:** Our Terms of Service (TOS) explicitly prohibits the use of our services for illegal robocalling, spoofing, or any activity violating the TRACED Act. Violation results in immediate service termination.

STIR/SHAKEN Implementation

- **Technical Methodology:** As a pure reseller, we utilize the SkySwitch & Viirtue platforms for all call originations. We rely on SkySwitch and Viirtue to technically sign calls using the STIR/SHAKEN framework.
- **Attestation Levels:** By maintaining accurate customer records and verifying the "Right to Use" for telephone numbers, we enable SkySwitch and Viirtue to project A-level attestation for the majority of our outbound traffic.

Mitigation Techniques & Analytics

CT utilizes both internal and upstream platform tools to monitor for malicious traffic:

- **Upstream Analytics:** We leverage SkySwitch's integration with Nomorobo and other reputation-based scoring to identify and block suspected illegal robocalls before they leave the platform. Viirtue uses STIR/SHAKEN authentication to sign calls on their network.
- **Invalid Number Blocking:** We block all outbound calls attempting to use invalid, unallocated, or "Do Not Originate" (DNO) numbers.

Traceback Cooperation

CT commits to full and timely cooperation with all investigations into the origin of suspicious traffic.

- **24-Hour Response:** We commit to responding to all requests from the Industry Traceback Group (ITG) and law enforcement within **24 hours**.
- **Records Retention:** We maintain traffic records (CDRs) for a minimum of 12 months to facilitate traceback capabilities.

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