



Platinum Information Services, INC Robocall Mitigation Program

Effective Date: September 18th, 2025 **Version:** 1.0

1. Purpose and Scope

This Robocall Mitigation Program ("Program") outlines the policies and procedures implemented by **Platinum Information Services** ("Company") to prevent the origination of illegal robocalls. This Program is designed to comply with the Federal Communications Commission (FCC) rules under 47 C.F.R. § 64.6305.

2. STIR/SHAKEN Implementation Status

- **Status:** Fully Implemented
- **Description:** The Company is currently exchanging authenticated traffic. For traffic where STIR/SHAKEN is not yet fully applied, the Company employs the mitigation practices outlined in this document.

3. Know Your Customer (KYC) Protocols

The Company mitigates illegal robocalling by ensuring that it knows the identity of its customers and the nature of their traffic before providing service.

- **Identity Verification:** Before onboarding, the Company verifies the customer's identity via tax ID (EIN), business registration, and physical address verification.
- **Service Agreement Terms:** All customer contracts include explicit prohibitions against using the Company's network for illegal robocalling, spoofing, or telemarketing violations.
- **Periodic Review:** The Company periodically reviews the business activities of high-volume customers to ensure continued compliance.

4. Traffic Monitoring and Analysis

The Company utilizes automated and manual tools to monitor traffic patterns originating from its network to detect signs of illegal robocalling:

- **High-Volume Detection:** Monitoring for atypical bursts of short-duration calls or high call-completion failure rates.
- **Source Verification:** Analyzing "From" fields to detect suspicious patterns, such as unassigned numbers or invalid Caller IDs.



- **Real-time Alerts:** The Company's NOC (Network Operations Center) receives alerts for traffic anomalies that deviate from established customer baselines.

5. Response to Traceback Requests

The Company is committed to full cooperation with the industry-led **Registered Traceback Group (ITG)** and federal/state law enforcement.

- **Point of Contact:** The Company has designated a responsive point of contact for traceback requests.
- **Turnaround Time:** The Company commits to responding to all traceback requests within **24 hours** of receipt.
- **Downstream Enforcement:** If a traceback leads to a specific customer or downstream provider, the Company will investigate and take immediate corrective action.

6. Enforcement and Mitigation Actions

If the Company determines that a customer is originating illegal robocalls, it will take one or more of the following actions:

1. **Investigation:** Immediate outreach to the customer to explain the traffic anomaly.
2. **Traffic Blocking:** Implementing temporary filters to block suspicious traffic.
3. **Service Termination:** Terminating the service agreement for customers found to be in violation of the Company's anti-robocalling policies.

7. Continuous Improvement

The Company reviews this Program annually or upon significant changes to FCC regulations to ensure that mitigation techniques remain effective against evolving robocall tactics.