

Precision West Telecommunications, Inc. Robocall Mitigation Plan

Date: 01/20/2026

1. Purpose

The purpose of this Robocall Mitigation Plan is to prevent the origination and transmission of illegal robocalls, including unwanted, fraudulent, or scam-related calls, and to ensure compliance with all applicable federal and state regulations. This plan establishes policies, procedures, and technical controls designed to mitigate robocall abuse and protect consumers, carriers, and our company.

2. Scope

This plan applies to all outbound voice traffic originating from our network, all customers using our voice, VoIP, SIP, or UCaaS services, and all employees, contractors, and systems involved in voice service provisioning, monitoring, and support.

3. Regulatory Compliance

We maintain this Robocall Mitigation Plan in accordance with FCC requirements and make it available to regulators and service providers upon request. Our company complies with FCC robocall and spoofing regulations, STIR/SHAKEN framework requirements, Telephone Consumer Protection Act (TCPA), Truth in Caller ID Act, and all applicable state and federal telecommunications laws.

4. Customer Vetting and Onboarding

To reduce the risk of illegal robocalls, we implement customer vetting procedures, such as verification of customer identity and business legitimacy, collection of legal business name, address, and contact information, validation of intended use of voice services, review of calling use cases prior to service activation, and additional scrutiny for high-volume or automated calling use cases.

5. Traffic Monitoring and Analytics

We actively monitor outbound calling activity using automated and manual methods, including call volume and rate analysis, short-duration call detection, abnormal calling patterns, high call failure or complaint rates, and calls to known scam-prone number ranges. Monitoring occurs in near real time and historically for trend analysis.

6. STIR/SHAKEN Implementation

Our company has implemented STIR/SHAKEN authentication for outbound calls. Calls are signed with appropriate attestation levels (A, B, or C). Attestation levels are assigned based on customer identity and number ownership. We do not assign full attestation unless the customer and calling number are fully verified. Calls that cannot be authenticated are clearly identified and handled according to industry best practices.

7. Complaint Handling and Investigation

We maintain a formal process for handling robocall complaints. We ask for receipt of complaint from carriers, regulators, or consumers. We investigate call records and customer activity. We take corrective actions taken, as necessary. We document complaints and retain them for audit and compliance purposes.

8. Enforcement and Corrective Actions

If illegal robocalling or suspicious activity is detected, we may take the following action(s): warning and educating the customer, call blocking or rate limiting, suspending outbound calling privileges, terminating service, and/or reporting activity to upstream carriers, or the authorities.

9. Call Blocking and Network Controls

We employ network-level protections, including blocking of known high-risk destinations or invalid/unallocated numbers, rate limiting for new or high-volume customers, and prevention of caller ID spoofing where possible. These controls are reviewed and updated regularly.

10. Recordkeeping and Documentation

We maintain records related to customer onboarding and verification, STIR/SHAKEN attestations, traffic monitoring and alerts, complaints, and investigations. Records are retained in accordance with regulatory and operational requirements.

11. Training and Awareness

Employees involved in voice service provisioning and support receive training on robocall regulations and compliance, fraud detection and escalation procedures, customer due diligence requirements, and incident response and reporting.

12. Plan Review and Updates

This Robocall Mitigation Plan is reviewed at least annually and updated as needed to reflect regulatory changes, industry best practices, network or service changes, and emerging robocall threats.

13. Contact Information

Robocall Mitigation Contact:

Name: Evelyn Klaas

Email: accounting@precision-west.com

Phone: 916-660-9828