

Robocall Mitigation Plan

We are a reseller of a Hosted VoIP platform provided by Skyswitch (RMD0002940). They perform the role in the call chain of a voice service provider with a full STIR/SHAKEN implementation serving end-users.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

ITCS VS, LLC., nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls:

- Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

- Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within 24 hours and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

- Robocall Mitigation Program

Call analytics software provided by Skyswitch (RMD0002940) is used to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. Skyswitch has implemented STIR/SHAKEN in their network.

This software provides detailed reporting to identify suspected illegal robocalls. The system blocks and alerts us if we process outbound calls whereby the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

As permitted by FCC 47 CFR 64.1200(k), we block a call when an originating number is malformed, unallocated, on a Do Not Originate list, and/or analytics software or prior activity indicates the call is likely an illegal robocall. As required by this federal regulation, we provide our customers information on how to opt out of call blocking (47 CFR 64.1200(k)(3)(iii)).

The same mitigation steps are performed for all inbound and outbound calls, regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, we terminate their service.

We are prepared to block calls or terminate service from any customer or source if asked to do so by the FCC.

We rely on our voice origination carriers to follow all common sense and FCC requirements and only accept traffic from providers with an RMD filing, as required by 47 CFR 64.6305(d).

- STIR/SHAKEN

As a reseller, we do not have the capability to implement STIR/SHAKEN. Our STIR/SHAKEN solution is supplied by Skyswitch (RMD0002940). They have fully implemented STIR/SHAKEN.