

Robocall Mitigation Program — Switchboardplus, LLC.

Provider: Switchboardplus, LLC

FRN: 0037909124

499 Filer ID: Pending

OCN: Pending

Role in Call Chain: Interconnected VoIP voice service provider serving end users (originating and terminating). We do not function as a gateway or intermediate provider.

1. STIR/SHAKEN Status and Implementation Plan

Switchboardplus, LLC has not yet implemented STIR/SHAKEN. Under 47 CFR § 64.6304(b) we are temporarily exempt because we are presently incapable of obtaining an SPC token; we will implement immediately upon issuance of our SPC token and certificate. We will use Hosted Signing with our own SHAKEN certificate via our upstream, authenticating all originated SIP calls and verifying Identity headers on termination. This applies to 100% of SIP-originated calls, and we will amend this filing to Partial/Complete within 10 business days once live.

2. Customer Vetting (KYC/KYB)

Before enabling service, Switchboardplus, LLC verifies business identity (legal name, EIN, state registration, responsible contacts), reviews the stated use-case and expected traffic, and confirms right-to-use any caller IDs (e.g., LOA/CSR). We screen for risk (consent evidence for marketing calls, sanctions/OFAC checks, spoofing/snowshoe patterns), deny or apply enhanced due-diligence to high-risk applicants, and require corrective proof before activation. We re-verify on material changes, perform periodic audits, and suspend or terminate accounts that fail checks or trigger abuse indicators.

3. Caller-ID / Number Assignment Controls

Switchboardplus, LLC permits outbound caller IDs only if we assigned or ported the number or the customer proves authority to use it (e.g., LOA/CSR or carrier authorization). A default TN we control is set at activation; alternate CLIs require prior approval. We block invalid/unallocated/impossible NANP numbers, internal/test ranges, and entries on Do-Not-Originate lists. We maintain CNAM/LIDB where applicable, perform periodic audits of CPN usage, and immediately disable unverified or abused CLIs. International presentation is enabled by exception. Spoofing and misrepresentation of caller identity are prohibited and enforced under our AUP.

4. Traffic Monitoring, Analytics, and Blocking

We continuously monitor outbound and inbound traffic for anomaly patterns (e.g., short-duration spikes, abnormal ASR/ACD, rapid burst rates, high-risk destinations, time-of-day irregularities). Thresholds are profiled per customer; when tripped, we automatically contain traffic (rate-limit, destination blocks, or suspend routes/accounts), investigate, and require remediation before restoration. Events are logged and reviewed daily; repeat or

egregious violations result in immediate termination and notice to upstream/downstream counterparts as appropriate.

5. Traceback & Law-Enforcement Cooperation

Switchboardplus, LLC responds within 24 hours to traceback requests from the FCC, the Industry Traceback Group, and law-enforcement. We provide call-path details and originating customer information, preserve and produce relevant records (CDRs, provisioning changes, SBC logs), and implement immediate mitigation (rate-limits, blocking, or account termination) when warranted. A 24x7 point of contact is maintained for traceback and investigations, and we comply with lawful requests (e.g., subpoenas or civil investigative demands) while maintaining proper chain-of-custody for evidence.

6. Do-Not-Originate (DNO) & Labeling Hygiene

We maintain and enforce DNO lists (internal, industry, and known government/financial institution ranges) and block any attempt to originate those numbers. Invalid, unallocated, and obviously malformed CLIs are rejected by default. Caller ID must accurately reflect the calling party; unlawful spoofing is prohibited and enforced under our AUP. We follow caller-ID presentation best practices, keep CNAM/LIDB entries accurate where used, and promptly correct or disable any CLIs that trigger negative analytics or mislabeled spam indicators.

7. Enforcement

Upon evidence of unlawful or abusive traffic, we immediately contain risk (rate-limit, disable CLIs, block destinations, or suspend service), notify the customer, and require documented remediation. Repeat or egregious violations result in immediate termination for cause, account closure, and notice to upstream/downstream partners when appropriate. We preserve CDRs, provisioning changes, and correspondence, assess financial holds/chargebacks to prevent further harm, and only restore service after verified corrective actions and management approval.

8. Recordkeeping & Audits

We retain call detail records, relevant SIP/signaling logs, provisioning/change tickets, KYC/KYB files, LOAs/CSRs and right-to-use evidence, enforcement actions, and (post-cert) STIR/SHAKEN signing and verification results. Config changes are change-controlled with

timestamps and approvers. We conduct periodic audits of KYC files and CPN authorizations, review analytics thresholds and alerting, track attestation mix and verification failures, document findings and remediation, and keep an auditable trail. Material changes trigger an RMD update within 10 business days.

9. 24x7 Point of Contact (Traceback/Mitigation)

Switchboardplus, LLC maintains a 24x7 contact for traceback and robocall-mitigation matters; we respond within 24 hours.

Primary: Nicholas Martin, CEO

Phone: 845-444-8273

Email: nm@switchboard-plus.com

10. Related Compliance (Summary)

We support Kari's Law (direct 911 dialing and on-site notifications where applicable) and RAY BAUM's Act (dispatchable location with 911). We maintain a CPNI policy with annual officer certification, incorporate TCPA/TSR prohibitions into our AUP and onboarding, and follow documented E911 provisioning/address-validation procedures. We cooperate with lawful requests, retain required records, and update filings (including RMD) upon material changes.

11. Future Updates

We will amend this RMD within 10 business days of any material change (STIR/SHAKEN status, OCN/499 IDs, contacts, or mitigation procedures) and update to Partial or Complete once all originated SIP calls are signed. We will recertify annually by March 1, keep the 24x7 contact current, and notify counterparties as needed.