



01/29/26

Robocall Mitigation Program Description

Intelligent IT Designs maintains a comprehensive Robocall Mitigation Program designed to prevent, detect, and mitigate the origination and transmission of illegal robocalls on its network. This program is intended to comply with all applicable federal and state regulations, including the Federal Communications Commission's (FCC) requirements related to call authentication and robocall mitigation.

Program Overview

The Robocall Mitigation Program employs a combination of technical controls, operational procedures, and ongoing monitoring to identify and prevent unlawful robocall activity. The program applies to all voice traffic originated, terminated, or transited by Intelligent IT Designs, including traffic from direct customers, resellers, and interconnected providers.

Call Authentication

Where technically feasible, Intelligent IT Designs implements the STIR/SHAKEN framework to authenticate caller ID information for SIP-based traffic. Calls that cannot be authenticated are subject to heightened scrutiny and additional mitigation measures.

Traffic Monitoring and Analytics

Intelligent IT Designs actively monitors network traffic for patterns indicative of illegal robocalling, including high-volume or burst calling patterns, short call duration anomalies, invalid or spoofed calling numbers, and consumer complaints or traceback notifications.

Mitigation and Enforcement

When illegal or suspicious robocall activity is detected, Intelligent IT Designs takes prompt and appropriate action, including blocking or labeling calls, throttling or suspending traffic, requiring remediation, or terminating service for repeat violations.

Customer Due Diligence

Intelligent IT Designs conducts reasonable due diligence on customers prior to service

activation. Customers are contractually prohibited from originating illegal robocalls or engaging in unauthorized caller ID spoofing.

Complaint Handling and Traceback Cooperation

Intelligent IT Designs investigates robocall complaints in a timely manner and cooperates fully with industry traceback efforts and law enforcement requests.

Program Review and Updates

The Robocall Mitigation Program is reviewed periodically and updated to reflect regulatory changes and industry best practices.