

FCC Robocall Mitigation Program Description

Introduction and Commitment

Independent Telephone Service Inc is committed to combating illegal robocalls and fraudulent automated calls on its network. As a voice service provider, we recognize our responsibility under the Federal Communications Commission (FCC) rules, particularly those related to the implementation of the STIR/SHAKEN framework and associated Robocall Mitigation Programs (RMPs). This document outlines our program's structure, policies, and procedures designed to prevent, detect, and mitigate the origination of illegal robocall traffic.

Our Robocall Mitigation Program is designed to meet the requirements set forth by the FCC, ensuring that we actively monitor and police the traffic originating from or traversing our network, and take swift action against bad actors.

STIR/SHAKEN Implementation Status

Independent Telephone Service Inc has implemented the STIR/SHAKEN framework as required by the FCC.

Implementation Detail	Status	Notes
STIR/SHAKEN Deployment	Fully Implemented	January 1, 2022
Level of Attestation Applied	Full	We apply the highest level of attestation possible based on customer verification.
Use of Non-IP Networks	No	

Robocall Mitigation Standards and Procedures

Our mitigation strategy is built on a multi-layered approach encompassing prevention, detection, and enforcement.

1. Know Your Customer (KYC) and Vetting Procedures

We maintain strict vetting procedures for all new and existing customers, particularly those originating high-volume or unusual call traffic.

- **New Customer Screening:** All potential customers are subjected to a risk assessment based on their proposed traffic type, volume, and business identity verification.
- **Atypical Traffic Monitoring:** We actively monitor for sudden, unexplained changes in call volume or calling patterns from established customers that may indicate a compromise or switch to illicit activity.
- **Service Termination Clauses:** All customer agreements explicitly state that illegal robocalling or traffic that violates the FCC's rules is grounds for immediate service suspension and termination.

2. Traffic Monitoring and Analysis

We employ advanced tools and analytics to identify and flag suspicious traffic patterns indicative of illegal robocalling.

- **Real-time Monitoring:** We use algorithms to monitor call completion rates, average call duration, answer-seizure ratios (ASR), and sequential numbering patterns.
- **Complaint Data Integration:** We proactively incorporate robocall complaint data from reliable sources, including the FCC, third-party industry partners, and our own customer reports, into our monitoring system.
- **Pattern Matching:** Our systems are configured to detect known or emerging robocall patterns, including "one-ring" scams, high-volume short-duration calls, and rapid cycling through DIDs.

3. Traceback and Enforcement

Upon detection or credible notification of suspected illegal robocall traffic, Independent Telephone Service Inc commits to rapid traceback and enforcement action.

- **Rapid Traceback Cooperation:** We will cooperate fully and immediately with traceback requests from the Industry Traceback Group (ITG) and law enforcement.
- **Mitigation Actions:**
 - **Initial Notification:** The originating customer will be immediately notified of the suspicious traffic and required to cease the activity within 24 hours.
 - **Suspension/Blocking:** If the illicit traffic continues or if the evidence is clear and substantial, we will suspend the customer's ability to originate traffic or, if necessary, block specific problematic traffic.
 - **Service Termination:** Repeat offenders or customers engaging in egregious illegal robocalling will have their service terminated permanently.

- **Reporting:** We document and retain records of all mitigation actions taken, including blocking decisions, customer notifications, and service terminations, for a minimum of 10 years.

Program Review and Compliance

4. Continuous Improvement

This RMP is a dynamic document subject to continuous review and improvement to adapt to evolving robocall tactics and regulatory changes.

- **Annual Review:** The RMP will be formally reviewed and updated at least annually by Josh Deck, the company president.
- **Staff Training:** Relevant personnel receive ongoing training on STIR/SHAKEN protocols, emerging robocall trends, and RMP enforcement procedures.

5. RMP Contact Information

For inquiries regarding this Robocall Mitigation Program or associated certifications, please contact:

Role	Contact Name (or Title)	Email Address
Compliance/RMP Lead	Josh Deck	josh@itstel.com

Certification

Independent Telephone Service Inc certifies that it has implemented a Robocall Mitigation Program designed to prevent the origination of illegal robocalls and that it will comply with the required STIR/SHAKEN implementation and enforcement measures. The information provided herein is true and accurate.

Date of Certification: 1/30/2026

Authorized Signature: Josh Deck, President

