

Fireline Communications, LLC.

Robocall Mitigation Plan

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

1. details the reasonable steps taken to avoid originating illegal robocalls
2. demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
3. filed in the Robocall Mitigation Database.

Steps We are Taking

Screening

Fireline Communications is a small voice service provider offering hosted PBX services via SIP on its network. Our customer base is comprised of small to medium sized businesses in the Southern California area. Our intake process includes a review and understanding of customers' needs and expectations. This information allows us identify customers which may be outside of our preferred customer base. An example would be an outbound call center.

Customers are required to provide the following information for identification purposes to begin services.

1. Legal Company Name
2. DBA
3. Primary and or Secondary Contact(s)
4. Tax ID
5. Service Address
6. Type of Business

While our Terms and Conditions provide for remedies due to using our services in any way that is prohibited by law, we have updated our Terms & Conditions to specifically define and prohibit the practice of robocalling, spam calling and all other form of calling prohibited by law. Customers failing to abide by these new conditions will face suspension up to termination for any violations.

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Services

To help minimize the risk of robocalling Fireline Communications employs the following services.

1. Fireline Communications is partnering with its origination and termination service providers to implement Stir/Shaken authentication on all calls originating from its network, until such time it has the capabilities to digitally sign its calls.
2. Our call screening and blocking services are provided to all customers allowing for the blocking of unwanted inbound callers, based on caller id.
3. All customers are allotted outbound call paths based on the number of seats purchased. This prevents our customers from running any mass outbound dialers usually associated with robocalling. Customers requesting a channel increase must provide justification for such request. Any request that we may deem suspicious will be denied.

Monitoring

Fireline Communications employs real time monitoring software to assist us in identifying any suspicious call patterns. Suspicious call patterns include but are not limited to, intermittent burst of high activity or low call completion rates/short call times. All activity that meets the criteria for suspicious call patterns are logged for investigation.

Investigations that deem the customer to be robocalling will be immediately suspended and no longer be allowed to make any new outbound calls. All violation will be reported to the appropriate authorities.

Traceback and Enforcement

Fireline Communications agrees to cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. We will provide dedicated resources to any such request to ensure a prompt response.