

# Averson IT Solutions LLC Robocall Mitigation Plan

Date: 2/11/2025

Provider Name: Averson IT Solutions LLC

FCC Registration Number (FRN): 0038015137

## 1. Introduction and Purpose

Averson IT Solutions LLC is a Voice Service Provider providing services primarily to end-user business customers. We take our responsibility to prevent illegal robocalling seriously. This Robocall Mitigation Plan (RMP) outlines the specific, reasonable steps we take to avoid originating illegal robocall traffic on our network, in accordance with 47 C.F.R. § 64.6305.

## 2. Know Your Customer (KYC) Procedures

Averson IT Solutions LLC implements a strict onboarding process to verify the identity and legitimacy of all customers before providing outbound calling capabilities. Our KYC process includes:

- Identity Verification: Collecting the legal name, physical business address, and Tax ID (EIN) of the customer.
- Business Vetting: Verifying the customer's business presence via website review, social media, or state business registries.
- Service Usage Disclosure: Requiring customers to disclose the nature of their traffic (e.g., standard business use vs. high-volume dialing).
- Agreement to Terms: All customers must sign a Service Agreement that explicitly prohibits the use of our services for illegal robocalling or spoofing in violation of the Truth in Caller ID Act.

## 3. STIR/SHAKEN Implementation Posture

Averson IT Solutions LLC is a non-facilities-based reseller. We utilize the infrastructure of our upstream provider, VoIP.ms, for call transit.

- Current Status: We are currently partially reliant on our upstream provider to perform STIR/SHAKEN authentication.
- Compliance Path: In accordance with the FCC's latest mandates for resellers, we are in the process of obtaining an SPC Token and our own digital certificate to ensure all calls originated by our customers are signed with our specific provider identity by the applicable deadlines.

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### 4. Traffic Monitoring and Response

- Analytics: We monitor for "red flag" behavior, such as unusually high call volumes, high percentages of short-duration calls, or high "call uncompleted" rates that suggest automated dialing.
- Traceback Cooperation: Averson IT Solutions LLC fully commits to responding to all "Traceback" requests from the Industry Traceback Group (ITG), the FCC, or law enforcement within 24 hours. We have designated an internal point of contact (Network Operations) to handle these requests immediately.
- Enforcement: If a customer is found to be originating illegal robocalls, we reserve the right to immediately suspend or terminate their service without notice.

### 5. Annual Recertification

Averson IT Solutions LLC will review and update this plan annually and recertify its accuracy in the Robocall Mitigation Database by the March 1st deadline each year.