

Robocall Mitigation Program Description

The filer is a non-facilities-based voice service provider that offers business voice services and resells Direct Inward Dial (DID) numbers. The filer does not operate its own facilities-based voice network and does not directly implement the STIR/SHAKEN authentication framework. All outbound calls are originated through upstream voice service providers that are responsible for STIR/SHAKEN authentication and compliance with 47 CFR § 64.6301.

Robocall Mitigation Program:

1. The filer conducts Know Your Customer (KYC) review for all customers prior to service activation.
2. The filer verifies business identity information and maintains accurate customer records.
3. The filer prohibits illegal robocalling, spoofing, or transmission of fraudulent traffic under its terms of service.
4. The filer monitors traffic patterns for unusual volume spikes or suspicious calling behavior.
5. The filer will promptly investigate any complaints or traceback requests and will cooperate fully with the FCC, law enforcement, and the Industry Traceback Group.
6. The filer commits to respond fully and within 24 hours to all traceback requests as required under 47 CFR § 64.6305.
7. The filer will immediately suspend or terminate customers found to be transmitting illegal robocalls or violating applicable regulations.

The filer relies on upstream voice service providers for STIR/SHAKEN authentication and attestation. The filer maintains internal policies and reasonable mitigation steps consistent with 47 CFR § 64.6305 to prevent illegal robocall traffic.

The filer certifies that it has not been prohibited from filing in the Robocall Mitigation Database and that any prior certification has not been removed by Commission action.