

# Robo Call Mitigation Plan

## 1. Provider Identification

**Company Name:** **Portable Consultants, LLC**

**Service Type:** Non-facilities-based VoIP service provide

**Service Scope:** Provision of cloud-based voice services, SIP trunks, hosted PBX, DIDs, SMS/MMS messaging, and related telecom services to business customers throughout the United States.

## 2. Statement of STIR/SHAKEN Implementation Status

Our company utilizes an upstream carrier infrastructure that is fully STIR/SHAKEN enabled. All eligible outbound calls are authenticated and signed in accordance with FCC rules and industry standards.

- We participate in STIR/SHAKEN through our underlying carrier
- All eligible SIP calls are authenticated and signed
- We do not operate our own STIR/SHAKEN signing infrastructure

**Status:** STIR/SHAKEN implemented through upstream provider

### Upstream Provider(s):

|                       | <u>Upstream Provider # 1</u>                    | <u>Upstream Provider # 2</u>                      |
|-----------------------|-------------------------------------------------|---------------------------------------------------|
| <b>Name:</b>          | Go2Uno LLC                                      | Momentum Telecom, Inc                             |
| <b>RMD Filing ID:</b> | RMD0004462                                      | RMD0001712                                        |
| <b>Address:</b>       | 10564 Sentinel Drive<br>SAN ANTONIO Texas 78217 | 1 Concourse Parkway Suite 600<br>Atlanta GA 30328 |
| <b>Phone:</b>         | 210-771-4109                                    | 877-440-1989                                      |
| <b>Email:</b>         | watson@go2uno.com                               | tracebackcompliance@momentumtelecom.com           |

## 3. Summary of Robocall Mitigation Practices

Even though STIR/SHAKEN is enabled at the carrier level, our company maintains additional robocall mitigation procedures to prevent the origination of illegal robocalls.

### A. Know Your Customer (KYC) Procedures

- Verify business identity prior to provisioning services:
- EIN match, Secretary of State registration, and business address validation
- Screening for high-risk industries (call centers, debt collectors, lead generators)
- Collect Responsible Officer information
- Require signed Acceptable Use Policy (AUP) prohibiting illegal robocalling

### B. Traffic Monitoring & Analytics

The company does not use analytic systems, software, or third-party vendors at this time to identify and block illegal robocall traffic. We are not aware of any such systems in use by its wholesale provider.

### C. Call Blocking & Enforcement

- Immediate suspension or rate limiting of suspicious call traffic
- Termination of accounts found transmitting illegal robocalls
- Mandatory remediation steps before reinstatement

#### **D. Complaint Handling**

- Maintain a dedicated abuse-reporting email and ticketing process
- Respond to traceback requests from the Industry Traceback Group (ITG) within 24 hours
- Investigate all robocall complaints and document findings

#### **4. Recordkeeping & Compliance Management**

- Maintain customer onboarding records, traffic reports, complaint logs, mitigation actions, and traceback responses for a minimum of **24 months**
- Compliance officer designated to oversee robocall mitigation operations and external inquiries

#### **Compliance Contact:**

**Name:** Rick Crabbe  
**Title:** CEO  
**Email:** rick@portableconsultants.com  
**Phone Number:** 425-403-0885

#### **5. Participation in Industry Traceback Group (ITG)**

Our company cooperates fully with the ITG and other regulatory agencies, providing call traceback information promptly and accurately when requested.

#### **6. Internal Policies and Employee Training**

- Staff are trained annually on FCC robocall rules, STIR/SHAKEN processes, and fraud detection techniques
- Sales personnel trained to identify high-risk businesses prior to account approval

#### **7. Certification**

Our company certifies that:

- We take reasonable and systematic measures to prevent origination of illegal robocalls
- We participate in STIR/SHAKEN through upstream provider
- We comply with 47 CFR § 64.6305 and all other FCC robocall mitigation requirements