

Robocall Mitigation Plan

Company:

Benefisol Media, LTD

30 W 47 st, #405, New York, NY 10036

1. Purpose and Scope

This plan outlines the policies, procedures, and technical measures that Benefisol Media, LTD implements to detect, prevent, and mitigate unlawful robocalls originating from or transiting its network.

It applies to all voice traffic handled by Benefisol Media, LTD, including:

- SIP trunking services
- VoIP calls
- Any call origination, transit, or termination services

2. Network Role

Benefisol Media, LTD functions as a non-facilities-based voice service provider and an interconnected VoIP provider.

The company:

- Originates traffic on behalf of retail customers.
- Passes calls to upstream carriers.
- Does not operate a public-switched telephone network (PSTN) infrastructure.

3. Implementation of STIR/SHAKEN

Status:

- Benefisol Media, LTD has fully implemented the STIR/SHAKEN framework within its IP-based voice networks.
- All SIP calls that qualify under FCC requirements are signed using “A”-level attestation when enough verification is possible.

Details:

- Calls from verified, known customers receive A-level attestation.
- Calls from customers with partial validation or indirect relationships may receive B-level attestation.
- Calls from unverifiable or non-domestic numbers are not signed and may be subject to mitigation or blocking.

4. Robocall Detection and Prevention Measures

Benefsol Media employs a multi-layered detection approach combining technical tools, policies, and manual reviews:

A. Technical Safeguards

- Use of call analytics platforms to detect abnormal call patterns, high-volume bursts, or short-duration calls.
- Daily automated scans for suspicious activity, e.g., calls with invalid or unallocated Caller IDs.
- Integration of FCC and industry robocall databases (e.g., USTelecom's traceback consortium).

B. Customer Vetting

- KYC (Know Your Customer): All customers undergo identity and use-case verification before receiving VoIP access.
- Service Agreements: Contracts include explicit prohibitions on illegal robocalling.
- Usage Monitoring: Accounts engaged in suspicious call behavior are immediately flagged for manual review and potential suspension.

C. Traffic Monitoring

- Continuous monitoring for key indicators such as:
 - High call volumes to known spam targets.
 - Short average call durations (under 6 seconds).
 - Unusual call patterns outside declared business hours.

5. Response and Enforcement Procedures

Benefsol Media, LTD enforces strict, immediate actions in response to detected issues:

Incident Type	Response
Suspicious call patterns	Immediate traffic analysis and call detail record audit
Verified unlawful calls	Termination of customer service and report to traceback consortium
Complaints or traceback requests	Respond within 24 hours to traceback investigators
Regulatory requests	Cooperate promptly with FCC or law enforcement

6. Traceback Cooperation

Benefisol Media participates in the Industry Traceback Group (ITG) and promptly responds to all traceback requests to identify the source of suspected illegal robocalls.

The company ensures verified traceback contacts remain available 24/7.

7. Consumer and Customer Education

Benefisol Media provides customer guidance on:

- Proper Caller ID usage.
- Best practices for legitimate telemarketing.
- Information on recognizing and avoiding scam calls.

8. Ongoing Review and Updates

This mitigation plan is reviewed at least annually and updated as:

- FCC or CRTC policies evolve.
- Internal systems or contracts change.
- New robocall risks or detection technologies emerge.

9. Compliance Declaration

Benefisol Media, LTD certifies that:

- It has adopted and implemented a robocall mitigation program as required by FCC rules.
- It complies with all relevant STIR/SHAKEN and call authentication regulations.
- It actively works to prevent unlawful robocalls and to cooperate fully in traceback efforts.

