

Robo Call Mitigation Plan

1. Provider Identification

Company Name: Southwest Communications LLC

Service Type: Non-facilities-based VoIP service provide

Service Scope: Provision of cloud-based voice services, SIP trunks, hosted PBX, DID's, 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):

Name:	PayG LLC dba SkySwitch
RMD Filing ID:	RMD0002940
Address:	Arborcrest 1, 751 Arbor Way, Ste 150, Blue Bell, PA 19422
Phone:	747-777-8100
Email:	support@skyswitch.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

- Monitor call patterns to detect anomalous usage indicative of illegal robocalling:
- High short-duration call ratios
- Large numbers of calls to sequential numbers
- Excessive concurrent call attempts
- Automated alerts for threshold breaches; accounts reviewed within 24 hours

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: Mike Walling
Title: Compliance Officer
Email: compliance@s-wc.com
Phone Number: 337-214-5177

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