

MGW Technology Robocall Mitigation Plan

1. Company Overview

MGW Technology is a VoIP reseller providing voice services to a single business customer consisting of six (6) endpoints. The phones are used by on-site security personnel for routine business communications. Call volume is low and consistent with normal business usage.

MGW Technology does not originate traffic independently and operates as a reseller utilizing the network infrastructure and switching services of its upstream provider, Talking Platforms.

2. Role in the Call Chain

MGW Technology acts as a VoIP Reseller and does not directly control the underlying switching, routing, or call authentication infrastructure.

The upstream carrier, Talking Platforms, is responsible for network-level call authentication and STIR/SHAKEN implementation where applicable.

MGW Technology does not generate or initiate bulk call campaigns, auto-dialed traffic, or prerecorded message campaigns.

3. STIR/SHAKEN Implementation

MGW Technology relies on its upstream provider, Talking Platforms, for STIR/SHAKEN call authentication compliance.

As a reseller without direct control over session border controllers or network elements that implement STIR/SHAKEN, MGW Technology ensures that all outbound traffic is transmitted through its upstream provider for authentication.

4. Robocall Mitigation Procedures

MGW Technology has implemented the following mitigation practices:

- Provides service to only one known business customer.
- Conducted customer identity verification prior to service activation.
- Maintains accurate customer contact and billing information.
- Monitors usage patterns for unusual call spikes or suspicious behavior.
- Call volume is low and consistent with security operations.
- No auto-dialing or mass calling capability is provided.
- Service terms prohibit unlawful robocalling, spoofing, or traffic pumping.
- Immediate suspension procedures are in place if suspicious activity is detected.

5. Know Your Customer (KYC) Procedures

- Verified the customer's business identity prior to activation.
- Confirmed the phones are used by on-site security guards.
- Maintains a direct business relationship with the customer.
- Does not allow anonymous or prepaid accounts.

6. Traffic Monitoring & Enforcement

MGW Technology monitors:

- Daily call volume
- Call duration patterns
- Outbound call consistency

Any abnormal increase in traffic volume would trigger investigation and potential suspension.

Given the extremely small footprint (6 phones, single customer), traffic anomalies would be immediately identifiable.

7. Certification

MGW Technology certifies that it:

- Is not originating illegal robocalls.
- Has taken reasonable steps to mitigate illegal robocalls.
- Relies on its upstream provider for STIR/SHAKEN authentication.
- Will cooperate with traceback requests from industry groups or regulators.
- Will immediately investigate and remediate any identified illegal traffic.