

Robo Call Mitigation Plan

1. Provider Identification

Company Name: **Esplicity Communications LLC**

Service Type: Non-facilities-based non-interconnect VoIP service provider

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.

Previous Business Name: IntelPeer Networks LLC

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:	IntelPeer Cloud Communications LLC
RMD Filing ID:	RMD0004630
	5975 South Quebec
Address:	Suite 300
	Centennial CO 80111
Phone:	720-889-9580
Email:	vtran@intelepeer.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 (where applicable)

- 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: Frank Lauria
Title: Managing Member
Email: frank.lauria@esplicity.com
Phone Number: 732-713-3562

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