

Robocall Mitigation Program Description

Comserv Connect Inc.

Service Classification: Interconnected VoIP Reseller

Last Updated: 1/1/2026

Comserv Connect Inc. is committed to preventing the origination and transmission of illegal robocalls and mitigating the risk of fraudulent or abusive traffic across our network. This Robocall Mitigation Program outlines the policies, procedures, and technical controls implemented to comply with FCC rules under 47 CFR § 64.6305 and related STIR/SHAKEN and Robocall Mitigation Database requirements.

Comserv Connect Inc. operates as an interconnected VoIP reseller and does not directly operate its own switching infrastructure for call authentication. All outbound voice traffic is routed through fully compliant upstream carrier partners that implement STIR/SHAKEN and are listed in the FCC Robocall Mitigation Database. We ensure that upstream providers authenticate calls and apply the appropriate attestation level (A, B, or C) based on the information available regarding the originating customer.

Prior to activating VoIP services for any customer, Comserv Connect Inc. performs Know-Your-Customer (KYC) verification procedures. These include verification of business identity, confirmation of physical address, review of corporate registration when applicable, and confirmation of the lawful intended use of services. All customers are required to sign Terms of Service and Acceptable Use Policies prohibiting illegal robocalling, spoofing, or unlawful automated dialing practices. For customers engaging in outbound dialing or campaign-based calling, additional documentation may be required, including descriptions of call content, consent procedures, TCPA compliance processes, and Do-Not-Call compliance policies.

Comserv Connect Inc. monitors call traffic for patterns indicative of illegal robocalling activity. Monitoring includes review of call detail records, analysis of high-volume or burst traffic, short-duration calls, high unanswered call ratios, sequential dialing patterns, customer complaints, and alerts or notifications from upstream carriers. Traffic analytics and upstream carrier reporting are used to identify potentially suspicious activity.

If suspicious or unlawful traffic is detected, Comserv Connect Inc. initiates an internal investigation which may include review of call detail records and immediate contact with the customer. Customers may be required to provide documentation demonstrating lawful calling practices. If adequate explanation or documentation is not provided, traffic may be suspended immediately. Service may be permanently terminated for confirmed violations. Comserv Connect Inc. cooperates fully with upstream carriers, the USTelecom Industry Traceback Group, the FCC, and law enforcement agencies, and responds promptly to all traceback requests.

Comserv Connect Inc. maintains current contact information in the FCC Robocall Mitigation Database and designates responsible personnel to respond to traceback inquiries within required timeframes. Records related to customer onboarding, signed agreements, call detail records, complaint investigations, and traceback communications are retained in accordance with FCC guidelines and industry best practices.

This Robocall Mitigation Program is reviewed periodically and updated as necessary to reflect changes in FCC guidance, industry standards, or operational practices. Comserv Connect Inc. remains committed to preventing illegal robocalls and maintaining compliance with all applicable federal regulations.