

Robocall Mitigation Plan

Pursuant to 47 C.F.R. § 64.6305, GreenLight Consulting Services, Inc. (“Company”) submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

This report describes the practices and procedures which GreenLight Consulting Services, Inc. has in place to protect its business customers and to mitigate illegal robocalls. GreenLight Consulting Services, Inc. may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

GreenLight Consulting Services, Inc., hasn’t been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, and none of its prior certifications have been removed from the Database by the Commission.

GreenLight Consulting Services, Inc., hasn’t been, at any time in the prior two years, the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with the “Providers” findings of actual or suspected wrongdoing due to it transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

GreenLight Consulting Services, Inc. is a Managed Service Provider “MSP”, based in Temecula, CA., and services customers in the greater Los Angeles and San Diego areas. As an MSP, “Provider” implements multiple IT products and services to its business customers along with adjunct telecommunications products and services.

Company is fully reliant upon its underlying carriers who provide the platform and services which the Company resells to support its business customers with telecommunications products and services. The Company is a “SkySwitch/CoreDial” reseller.

GreenLight Consulting Services, Inc. is registered with the Federal Communications Commission (“FCC”) - FRN #: 0037985934

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THE COMPANY PRIMARY PLACE OF BUSINESS:

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City, State, Zip: Temecula, CA 92591
Phone: 714-790-3344
Website: www.greenlightmsp.com
General Email: info@greenlightmsp.com

OFFICERS OF THE COMPANY ARE:

CIO/CISO

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I. STIRSHAKEN COMPLIANCE

Through its underlying carriers the Company is fully compliant as a “SkySwitch/CoreDial” reseller. As a “SkySwitch/CoreDial” reseller GreenLight Consulting Services, Inc. does not own its own network or infrastructure of any kind and therefore has no access to any IP portion or a SIP header of any call.

II. ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that GreenLight Consulting Services, Inc. has implemented to detect and prevent illegal robocalls on its network in accordance with Federal Communications Commission Orders. GreenLight Consulting Services, Inc. will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should GreenLight Consulting Services, Inc. determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment

GreenLight Consulting Services, Inc. is a switchless reseller that offers calling products by using an underlying platform provider who owns the infrastructure to support VoIP calling. The Company resells these services to business customers. The Company’s customers do not typically originate high volume short duration (“HVSD”) calls and GreenLight Consulting Services, Inc. has not received information suggesting that robocalls are originated by any of its customers. Therefore, GreenLight Consulting Services, Inc. and leadership do not consider us at high risk of originating illegal robocalls.

III. CUSTOMER VETTING PRACTICES

GreenLight Consulting Services, Inc. has a rigorous vetting process to support the business customers that we resell services to. GreenLight Consulting Services, Inc. has an in-depth onboarding process where our representatives work with the prospect/customer to understand all the unique factors of the Customer’s business. This allows us to get to know our customers and provide the best possible service to the customer by fully understanding all facets of their business operations.

GreenLight Consulting Services, Inc. performs a thorough reputation check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

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GreenLight Consulting Services, Inc. conducts due diligence on new and existing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- Company verifies customer's business reputation prior to providing service.
- Company verifies customer information when contracts are renewed or services are added.
- Company verifies the customer's identity and their right to use the telephone number presented on calls.
- Company has a specific Acceptable Use Policy ("AUP") which defines all companies the policies regarding the circumstances by which GreenLight Consulting Services, Inc. will deny, suspend or terminate service to a customer.

When the Company commences operations with a customer, they will verify all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Additionally, as mentioned above all the "Providers" customers are required to agree to, and are contractually bound by GreenLight Consulting Services, Inc. strict policies, contractual terms and conditions and a Company Acceptable Use Policy ("AUP") prohibiting the act of fraudulent voice activity as a condition of doing business with GreenLight Consulting Services, Inc.

If any customer is found to be in possible and/or actual violation of any company policy as it relates to suspicious traffic and/or possible fraud, Company has the right to immediately halt, cease and/or suspend the customer's account or associated telephone numbers.

Measures to Prevent or Avoid Illegal Robocalls

- Company has in place an acceptable use policy (AUP).
- Company has policies designed to detect and prevent fraudulent traffic on its network.
- Company uses analytics technologies and services provided by its upstream provider and third parties to monitor traffic on its network and identify potentially unlawful call origination activity. If GreenLight Consulting Services, Inc. has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, GreenLight Consulting Services, Inc. can suspend and/or terminate service to the customer by the use of the underlying platform which is provided by the underlying carrier.

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- GreenLight Consulting Services, Inc. has a protocol to work with the upstream provider to block various types of calls by default by using the tools provided to the Company by the underlying provider who supports the platform.

TRACEBACK

GreenLight Consulting Services, Inc. is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories. The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using the Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of tools provided by its underlying carriers and platform providers along with third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

UPSTREAM PROVIDERS:

As a switchless reseller, GreenLight Consulting Services, Inc. uses the services and provisioned platforms from several upstream providers. The two key primary upstream providers listed below provide the platform to GreenLight Consulting Services, Inc. As a SkySwitch/CoreDial reseller, the Company does not own its own infrastructure. Further the Company is reliant upon its upstream provider for switching customer calls that originate on its platform. And the Company does not have access to the SIP header of any VoIP call.

1. PayG LLC dba SkySwitch
Arborcrest 1, 751 Arbor Way Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com

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2. CoreDial, LLC

Arborcrest 1, 751 Arbor Way Suite 150

Blue Bell, PA 19422

Phone: 215.297.4400

Email: cdsupport@skyswitch.com

As stated the Company (as a “SkySwitch/CoreDial” reseller) by leveraging its underlying platform provider. The company has the ability though this platform and interact with the upstream provider, to reserve the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid.

The Company (as a “SkySwitch/CoreDial” reseller) by its underlying platform provider is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

ONGOING ROBOCALL MITIGATION

GreenLight Consulting Services, Inc. monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When the Company or its underlying provider detects network usage patterns consistent with illegal robocalls or suspects illegal robocalling is taking place, GreenLight Consulting Services, Inc. will immediately seek to identify the party that is originating, terminating, or routing these calls and take appropriate action.

The actions taken may include, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or dba name; blocking the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of Company plan to mitigate and prevent any originating robocalls, GreenLight Consulting Services, Inc. is committed to early detection and investigation of possible robocalling conditions. Among other things, with the tools and resources provided to the Company by its underlying carrier, GreenLight Consulting Services, Inc. watches for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. With the tools provided to the Company by its underlying provider, GreenLight Consulting Services, Inc. also monitors for originating calls classified as high volume short duration (“HVSD”), tracks for low call completion percentages, and/or originating calls with sequential called-to-number dialing patterns (of which as mentioned earlier in this plan has a history of being benign)

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PROVIDER DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to formal action or investigation due to suspected unlawful robocalling or spoofing. If when and as the Company business may change designated company representatives only will update this RMP as appropriate.