



Lee Infinite Solutions

Robocall Mitigation Program Description

1. Company Overview

Lee Infinite Solutions (“Lee Infinite,” “Company”) is a technology services provider based in Indianapolis, Indiana, offering structured cabling, network infrastructure, security cameras, access control, Wi-Fi solutions, and VOIP/voice services to business customers. The Company provides outbound and inbound voice services primarily to small and medium-sized businesses and does not operate a high-volume call center or mass-dialing operation.

Lee Infinite is committed to preventing the origination and transit of illegal robocalls on its network and to complying with all applicable Federal Communications Commission (FCC) robocall mitigation requirements.

2. Commitment to Robocall Mitigation and Compliance

Lee Infinite has implemented a Robocall Mitigation Program designed to:

- Take reasonable, effective steps to avoid originating illegal robocall traffic.
- Support STIR/SHAKEN implementation where applicable and feasible in cooperation with upstream and downstream providers.
- Cooperate fully with industry traceback efforts and law enforcement, including timely responses to traceback requests.
- Monitor traffic patterns and customer behavior for indications of illegal or abusive calling.

The Company will maintain and periodically update this Program as industry best practices and FCC requirements evolve.

3. Scope of Services Covered

This Robocall Mitigation Program applies to all Lee Infinite services that can originate or pass U.S. voice calls, including:

- SIP/VOIP services delivered to business customers.
- Cloud-based or hosted PBX services.
- Any third-party voice services resold or integrated by Lee Infinite, to the extent permitted under those providers' terms.

High-risk use cases such as auto-dialed marketing campaigns, lead generation call centers, and large-scale outbound telemarketing are either prohibited or subject to additional scrutiny and controls as described below.

4. Know Your Customer (KYC) and Onboarding Controls

Lee Infinite uses a "Know Your Customer" approach when onboarding voice customers to reduce the risk that illegal robocallers gain access to its services. At a minimum, the Company:

1. Verifies customer identity and legitimacy
 - Collects business name, address, tax ID (if applicable), and key contact information.
 - Verifies the customer's business identity using public records, websites, or other commercially reasonable methods.
2. Reviews business use case and calling patterns
 - Obtains a description of how the customer will use voice services (e.g., standard business calling, support lines, limited outbound notification calls).
 - Reviews whether the proposed use case involves high-volume outbound calling, lead generation, or telemarketing.
3. Evaluates risk and may refuse or limit service
 - May reject or suspend service for customers that cannot be reasonably verified, appear to be misrepresenting their identity, or intend to engage in prohibited calling activities.
 - May limit call paths, CPS (calls per second), or total call volumes for new or higher-risk customers until a normal traffic pattern is established.

5. Call Authentication and STIR/SHAKEN

Where technically and commercially feasible, Lee Infinite works with its upstream carriers and platform vendors to support caller ID authentication (STIR/SHAKEN) for calls that traverse IP-based networks. The Company:

- Uses carriers and platforms that support STIR/SHAKEN attestation for eligible traffic where possible.
- Ensures that caller ID values used by customers are associated with numbers that the customer is authorized to use.
- Avoids spoofing caller ID for numbers not legitimately assigned or authorized for the customer.

In environments where STIR/SHAKEN cannot yet be fully implemented (e.g., certain TDM interconnections), Lee Infinite relies on the additional mitigation practices described in this Program.

6. Traffic Monitoring and Analytics

Lee Infinite monitors customer traffic patterns to identify behavior that may indicate illegal robocalls, including but not limited to:

- Unusual spikes in call volume or calls per second.
- Very short average call durations consistent with mass dialing and non-answered calls.
- High volumes of calls to invalid, unassigned, or unallocated numbers.
- Call patterns that match known scam or spam activity profiles (e.g., repeated calls to large lists of consumers in rapid succession).

When available via carrier or platform tools, the Company may use:

- Reputation scoring and analytics on calling numbers.
- Blacklists and “Do Not Originate” lists.
- Alerts or reports from upstream/downstream carriers indicating potential illegal robocall activity.

If suspicious traffic is detected, Lee Infinite will promptly investigate and may take mitigation actions as described in Section 8.

7. Prohibited and Restricted Uses

Lee Infinite prohibits the use of its services to originate or facilitate:

- Illegal robocalls, including calls that violate the Telephone Consumer Protection Act (TCPA), the Telemarketing Sales Rule, or other applicable laws.
- Spoofing of caller ID information with the intent to defraud, cause harm, or wrongfully obtain anything of value.
- Mass unsolicited telemarketing campaigns that lack proper consent, opt-out mechanisms, or legal compliance.

Customer agreements and acceptable use policies explicitly prohibit these activities and reserve the Company's right to suspend or terminate service for violations.

8. Investigation, Mitigation, and Enforcement

When Lee Infinite becomes aware of a potential source of illegal robocall traffic, either through internal monitoring or notification from carriers, traceback entities, or regulators, the Company will:

1. Promptly investigate
 - Review call detail records, patterns, and customer account information.
 - Attempt to verify whether the traffic is authorized, lawful, and consistent with the customer's stated use case.
2. Take appropriate mitigation actions

Depending on severity and evidence, actions may include:

 - Notifying the customer and requesting immediate corrective action.
 - Temporarily blocking or rate-limiting specific traffic, destinations, or caller IDs.
 - Blocking traffic associated with known fraudulent or "Do Not Originate" numbers.
 - Suspending or terminating the customer's service for confirmed or repeated violations.
3. Document and escalate as required
 - Keep records of investigations, communications, and actions taken.
 - Cooperate with traceback groups and law enforcement requests, including timely responses and provision of relevant records where permitted by law.

9. Cooperation with Traceback and Industry Efforts

Lee Infinite cooperates with recognized traceback organizations, upstream carriers, and law enforcement to identify and stop illegal robocall campaigns. The Company:

- Responds in a timely manner to traceback inquiries.
- Identifies the originating customer or upstream source when possible.
- Takes appropriate action against customers confirmed to be originating illegal robocalls.

10. Customer Education

Lee Infinite provides basic guidance to its voice customers on:

- Proper use of caller ID and avoidance of illegal spoofing.
- Applicable restrictions on robocalls and automated dialing under U.S. law.
- Best practices for maintaining a positive calling reputation and avoiding call blocking.

This may be done through welcome materials, contract language, or periodic communications.

11. Program Governance and Review

The Robocall Mitigation Program is overseen by Lee Infinite's management, who are responsible for:

- Ensuring that onboarding, monitoring, and enforcement processes are implemented by operational staff or vendors.
- Periodically reviewing the Program and updating it to reflect changes in FCC rules, industry best practices, and technology.
- Maintaining records of mitigation actions and updates to this Program.

Lee Infinite will review this Program at least annually, or sooner if required by regulatory changes, and will update any filed Robocall Mitigation Database certifications as needed.

12. Contact Information

Questions regarding this Robocall Mitigation Program, as well as traceback and regulatory inquiries, may be directed to:

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