



302 W Center St., Alma, MI 48801

(989) 466-6104

ispmgt.com

Robocall Mitigation Plan: ISP Management, Inc.

Effective Date: February 26, 2026

Address: 302 W Center Street, Alma, MI 48801

1. Introduction and Purpose

ISP Management, Inc. is a small voice service provider (VSP) dedicated to stopping illegal calls from originating on our network and monitoring the calls coming into our network. The FCC requires that all VSPs certify in the Robocall Mitigation Database (RMD) that they have:

ISP Management, Inc. operates under a fully implemented RMP framework, leveraging our wholesale partnership with **Atheral LLC (FRN 0028070290)** to provide crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services.

2. Know Your Customer (KYC)

ISP Management, Inc. follows the best practices for vetting caller identity as described by the NANC Call Authentication Trust Anchor Working Group. Our KYC procedures include:

- **Identity Verification:** We require all new subscribers to provide government-issued identification or verifiable business documentation (Articles of Incorporation, Tax ID, etc.).
- **Service Review:** We evaluate the intended use of the voice service to ensure it aligns with legitimate business or residential activities.
- **Continuous Monitoring:** If a customer's usage patterns change significantly, we perform a follow-up review to confirm the legitimacy of the traffic.

3. International Subscribers

ISP Management, Inc. does not sell origination or termination services to subscribers located outside the United States. All originating traffic must come from verified domestic accounts.



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4. Acceptable Use Policy (AUP)

ISP Management, Inc. maintains a strict AUP that subscribers must sign before service activation. Our AUP explicitly prohibits:

- Using services for fraudulent, abusive, or illegal activities.
- Originating "spoofed" calls with intent to defraud, cause harm, or wrongly obtain value.
- Engaging in telemarketing or "robocalling" that violates the TCPA or Truth in Caller ID Act.
- Submitting false or misleading information to the company regarding caller identity.

5. Traceback Requests and Cooperation

ISP Management, Inc. is committed to responding fully and promptly to all traceback requests from the FCC, law enforcement, state attorneys general, Atheral LLC, and the Industry Traceback Group (ITG).

- **Response Time:** We strive to respond to all valid requests within 1 business day.
- **Enforcement:** Subscribers are required to comply with traceback requests via our AUP.
- **Point of Contact:** Traceback requests should be sent to **support@ispmgt.com** for immediate processing.

6. Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity that is not directly managed by **ISP Management, Inc.** or our partner **Atheral LLC**, we require:

- A valid **Letter of Authorization (LOA)** proving the subscriber is an authorized user of that TN.
- Upon verification, documentation is provided to **Atheral LLC** so they can provide the appropriate STIR/SHAKEN attestation for those calls.

7. Real-Time Monitoring and Investigation

Through our partner **Atheral LLC**, we utilize the **TransNexus ClearIP** solution to monitor voice traffic in real-time. This system alerts us to:

- Calls with invalid, unallocated, or "Do Not Originate" (DNO) numbers.
- High-volume traffic pumping (e.g., more than 100 calls in a 15-minute window to a specific location).
- Irregularities in **Short Call Duration (SDC)** or **Answer-Seizure Ratio (ASR)**.
- **Wangiri** triggers (short calls to high-cost international destinations).



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Action Protocol: If suspicious activity is detected, **ISP Management, Inc.** will immediately investigate. If the activity is deemed unlawful, we will issue a warning or terminate service immediately per our AUP.

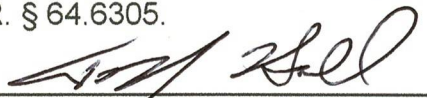
8. STIR/SHAKEN Implementation Status

As of **June 30, 2022**, our wholesale partner **Atheral LLC** has fully implemented STIR/SHAKEN. **ISP Management, Inc.** works in tandem with Atheral to ensure all calls originating from our network are appropriately signed and authenticated.

Certification

ISP Management, Inc. hereby certifies that it has implemented the above Robocall Mitigation Plan in accordance with 47 C.F.R. § 64.6305.

Authorized Signatory: _____


Jeff N. Hall

Title: President

Date: February 26, 2026