

Robocall Mitigation Plan

1. Company Information

- **Company Name:** Clifix Inc
- **FCC Registration Number (FRN):** 0031364862
- **Date of Implementation:** 2/27/26
- **Contact Information:**

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2. Commitment to Compliance & Traceback

- [Company Name] commits to complying with all applicable FCC rules regarding call authentication and mitigation.
- We pledge to cooperate with law enforcement, the FCC, and the industry traceback consortium, and to respond to all traceback requests within 24 hours.

3. STIR/SHAKEN Implementation & Responsibility

- **Status:** [Fully Implemented / Partial Extension / No Extension].
- *If partial/no extension:* Describe how authentication is applied to all calls.
- *If extension:* Describe the specific, reasonable steps taken to mitigate illegal traffic while operating under an extension.

4. "Know Your Customer" (KYC) Procedures

- **Customer Onboarding:** [Company Name] collects and verifies customer information, including, but not limited to, physical business address, contact person, business registration, and the nature of their business.
- **Contractual Terms:** Our service agreements explicitly prohibit the origination of illegal or spam traffic. Customers violating this policy are subject to immediate service termination.

5. Technical Mitigation & Monitoring

- **Traffic Analysis:** We use real-time SIP analytics or monitoring software to monitor outgoing traffic, analyzing Call Detail Records (CDRs) for anomalies.
- **Blocking/Filtering:** We employ mechanisms such as:
 - **Do Not Originate (DNO) Lists:** Blocking calls from known invalid or unallocated numbers.
 - **Reputation Management:** Utilizing reputational look-up services for numbers.
 - **Threshold Monitoring:** Setting limits on concurrent call paths and traffic volume to identify potential illegal activity.
- **Action Plan:** When suspicious traffic is detected, we [warn the customer / throttle traffic / terminate service].

6. Mitigation for Non-Gateway/Intermediate Providers (if applicable)

- For calls transiting our network, we ensure we do not accept traffic from non-compliant providers listed in the RMD (Robocall Mitigation Database).

7. Periodic Review

- This plan is reviewed [frequency, e.g., annually] to ensure effectiveness and compliance with industry standards.