

Burley Technology Solutions, LLC – Robocall Mitigation Plan

1. Purpose and Scope

Burley Technology Solutions, LLC provides voice services using Skyswitch.com (a BCM One Company) and Grandstream UCMs for call management, with BCM One's various voice service providers, such as Inteliquent CLEC and Bandwidth.com CLEC, as our voice termination providers. We also use Telnyx, LLC as a voice termination provider for our Grandstream UCM Clients.

This Robocall Mitigation Plan outlines the policies, procedures, and technical safeguards we use to prevent the origination of illegal robocall traffic, in compliance with FCC requirements under 47 CFR §64.6305(a)(1).

2. Customer Vetting and Service Restrictions

- Strict Vetting: We do not provide wholesale VoIP services or permit anonymous sign-ups. All clients are either local businesses or organizations with whom we have a direct relationship.
- Approval Process: Each customer is vetted by management prior to service activation. This includes verification of business identity and use case.
- Controlled Provisioning: All outbound SIP trunks and terminations are provisioned exclusively by Cloudhook Communications' staff technicians. Customers do not have unrestricted access to originate traffic outside of approved configurations.
- Acceptable Use Policy: Customers agree to terms of service prohibiting illegal robocalls, fraud, or abusive calling patterns. Violations may result in immediate suspension or termination.

3. Call Monitoring and Fraud Prevention

- Traffic Analysis: Outbound calls are continuously monitored for abnormal patterns, including:
 - Short-duration, high-volume calling.
 - Calls to high-risk or known fraudulent destinations.
 - Unusual spikes in call attempts or volumes.
- Automated Alerts: Network alerts trigger immediate review of suspicious call activity by our operations team.
- Intervention Measures: If illegal or fraudulent call patterns are detected, outbound traffic may be temporarily blocked pending investigation.

4. STIR/SHAKEN and Caller ID Authentication

Burley Technology Solutions supports STIR/SHAKEN through our Voice Service Providers for outbound call authentication. Caller ID attestation levels are applied based on verified customer identity, ensuring accurate caller identification in compliance with FCC requirements.

5. Traceback and Enforcement Cooperation

- Commitment to 24-Hour Response: Cloudhook Communications commits to responding within 24 hours to all traceback requests from:
 - The FCC,
 - Law enforcement agencies, and
 - The designated industry traceback consortium.
- Cooperation: We will fully cooperate with these entities to investigate and stop any illegal robocallers that may attempt to use our services.
- Remediation: Any customer found originating illegal robocalls will have service immediately

suspended, with permanent termination where warranted.

6. Compliance and Continuous Improvement

- FCC Compliance: This plan fulfills the requirements of 47 CFR §64.6305(a)(1).
- Ongoing Review: Policies, monitoring practices, and security measures are reviewed regularly to ensure effectiveness and alignment with industry standards.
- Commitment: Burley Technology Solutions, LLC is dedicated to preventing unlawful robocalls and ensuring the integrity of the communications ecosystem.