

Robocall Mitigation Program Description

Right Tech Inc.

Right Tech Inc. is a non-facilities-based managed service provider and reseller of hosted VoIP services delivered through an upstream carrier platform (SkySwitch). Right Tech Inc. does not directly originate voice traffic, operate switching infrastructure, or assign telephone numbers independently. All voice services are provided through underlying carriers that implement caller authentication and network-level mitigation controls.

Right Tech Inc. has implemented the following Robocall Mitigation Program consistent with FCC requirements under 47 CFR § 64.6305.

1. Reliance on Upstream Provider STIR/SHAKEN Implementation

Right Tech Inc. relies on its upstream service provider, SkySwitch, and their underlying carrier partners to implement the STIR/SHAKEN framework within the IP portions of the network.

The upstream provider is responsible for:

- Caller ID authentication and signing of outbound calls
- Verification of inbound caller identity where supported
- Network-level robocall mitigation controls
- Compliance with FCC authentication obligations

Right Tech Inc. ensures that all voice traffic is transmitted only through providers that certify compliance with FCC robocall mitigation requirements.

2. Customer Vetting (Know Your Customer Procedures)

Prior to enabling voice services, Right Tech Inc. performs reasonable customer verification procedures, including:

- Verification of customer identity and business legitimacy
- Collection of business contact information
- Validation of authorized account users
- Review of intended service usage

Customers intending to conduct outbound calling campaigns or higher-volume calling are subject to additional review.

3. Monitoring and Detection

Although Right Tech Inc. does not operate network switching equipment, we monitor customer usage and account activity for indicators of suspicious behavior, including:

- Unusual call volume spikes
- Abnormal calling patterns
- Customer complaints related to unwanted calls
- Notifications received from upstream carriers

We cooperate with SkySwitch and underlying carriers regarding traffic monitoring and mitigation actions.

4. Mitigation Actions

If potentially unlawful robocall activity is identified:

- Service may be suspended or restricted immediately
- Customers may be required to provide explanation or documentation
- Accounts engaged in prohibited activity may be terminated
- Incidents are escalated to the upstream provider for investigation and enforcement

Right Tech Inc. complies with traceback and investigation requests received through upstream carriers or authorized industry traceback entities.

5. Record Retention

Right Tech Inc. maintains records including:

- Customer onboarding information
- Service agreements
- Account activity records
- Investigation and mitigation documentation

Records are retained consistent with regulatory and business requirements.

6. Prohibition of Illegal Robocalls

Right Tech Inc. strictly prohibits customers from using services to originate:

- Illegal robocalls
- Caller ID spoofing
- Fraudulent or deceptive traffic
- Calls violating the Telephone Consumer Protection Act (TCPA) or FCC rules

Customers violating these policies are subject to immediate suspension or termination.

7. Ongoing Compliance

Right Tech Inc. periodically reviews its robocall mitigation practices and relies on its upstream providers' compliance programs to ensure continued adherence to FCC regulations and industry best practices.