

Robocall Mitigation Program Description

360 Business Solutions LLC

Voice Service Provider – Serving End Users

1. STIR/SHAKEN Implementation

360 Business Solutions LLC is a Voice Service Provider serving end-user business customers. All outbound calls originate via our hosted VoIP platform powered by SkySwitch.

STIR/SHAKEN authentication is fully implemented across our originating network. All calls that originate from our network are authenticated in compliance with 47 CFR § 64.6301. Calls are signed consistent with applicable FCC requirements.

2. Description of Robocall Mitigation Program

All calls originated on our network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a).

360 Business Solutions LLC has implemented reasonable steps to prevent the origination of illegal robocall traffic, including:

- Verification of customer identity prior to service activation
- Review of customer business purpose and intended call use
- Enforcement of Acceptable Use Policies prohibiting illegal robocalls
- Monitoring of originating traffic patterns for suspicious behavior
- Immediate investigation of anomalous traffic patterns
- Suspension or termination of service for customers engaged in unlawful calling activity

3. Traffic Monitoring and Enforcement Procedures

We monitor originating traffic for indicators of potentially unlawful robocalling activity, including but not limited to:

- High-volume short-duration calling
- Sequential or predictive dialing patterns
- Elevated unanswered call ratios
- Customer complaints or traceback notices

If suspicious activity is detected, 360 Business Solutions LLC will:

- Promptly investigate the account
- Require documentation supporting the legitimacy of the calling campaign
- Suspend, restrict, or terminate service if violations are identified

4. Traceback Response Commitment

360 Business Solutions LLC commits to respond fully and within 24 hours to all traceback requests from:

- The Federal Communications Commission
- Law enforcement agencies
- The Industry Traceback Group

We will cooperate fully with such entities to investigate and mitigate any illegal robocalling activity originating from our network.

5. Recordkeeping

360 Business Solutions LLC maintains records sufficient to identify originating customers and associated calling activity consistent with FCC requirements.