



# STIR/SHAKEN Reliance and Robocall Mitigation Policy

**Effective Date:** January 26, 2026

**Policy Owner:** Melissa Barry - President

**Applies To:** All employees, contractors, and customers using ITSolutions|Currie voice services

**Version:** 1.0

## 1. Purpose

This policy establishes ITSolutions|Currie requirements for (a) reliance on upstream carrier partners for call authentication using the STIR/SHAKEN framework where supported and (b) mitigation of illegal robocalls and other abusive calling activity on or through ITSolutions|Currie voice services.

## 2. Scope

This policy applies to all hosted VoIP and related voice services offered by ITSolutions|Currie as a reseller or service provider, including all customer accounts, end users, and any systems used to provision, route, manage, or monitor calls.

## 3. Policy

- **STIR/SHAKEN reliance:** ITSolutions|Currie operates as a hosted VoIP reseller and relies on upstream carrier partner(s) to implement call authentication using the STIR/SHAKEN framework where supported.
- **Prohibition on illegal robocalls:** ITSolutions|Currie prohibits the use of its services for unlawful robocalls, fraudulent calling, caller ID spoofing used for unlawful purposes, or any other illegal or abusive calling activity.
- **Reasonable mitigation measures:** ITSolutions|Currie takes reasonable steps to prevent its services from being used for illegal robocalling, including customer identity verification, acceptable use requirements, and monitoring for suspicious calling activity.
- **Investigation and action:** When suspected illegal robocall traffic is identified or reported, ITSolutions|Currie will investigate and take appropriate action, which may include warning, blocking, suspension, termination of service, and/or escalation to upstream partners or authorities as applicable.
- **Traceback cooperation:** ITSolutions|Currie will cooperate with traceback requests and other lawful investigations to the extent required and permitted by applicable law and contractual obligations.



## 4. Procedures

### 4.1 Customer Due Diligence

- Verify customer identity using reasonable, risk-based methods prior to activation (e.g., business registration details, contact validation, and payment verification as applicable).
- Require customer agreement to ITSolutions|Currie Acceptable Use Policy and any additional robocall/telemarketing restrictions.
- Maintain up-to-date customer contact and billing information.

### 4.2 Monitoring and Detection

- Monitor call patterns for indicators of suspicious or abusive activity (e.g., unusually high call volumes, short-duration calls, high ASR/low completion, repeated calling to sequential numbers, or repeated complaints).
- Review complaints and reports from customers, downstream partners, upstream carriers, and traceback groups.
- Document alerts, findings, and actions taken.

### 4.3 Response and Remediation

- Investigate suspected illegal robocall activity promptly, including review of relevant call detail records and customer account information.
- Take appropriate action based on risk and findings, which may include customer outreach, call blocking, service restriction, suspension, or termination.
- Escalate to upstream carrier partner(s) when network-level controls or authentication-related actions are required.

### 4.4 Traceback and Lawful Requests

ITSolutions|Currie will cooperate with traceback requests and other lawful requests for information to the extent required and permitted by applicable law, and consistent with contractual obligations, privacy requirements, and data retention practices.

## 5. Enforcement

Violations of this policy may result in disciplinary action (for personnel) and/or suspension or termination of service (for customers), in addition to any other remedies available to ITSolutions|Currie under contract or applicable law.



## 6. Records and Retention

ITSolutions|Currie will retain records related to customer onboarding, complaints, investigations, and actions taken under this policy in accordance with ITSolutions|Currie record retention requirements and applicable law.

## 7. Definitions

- **STIR/SHAKEN:** A set of standards used to help authenticate and verify caller identity in IP-based voice networks, where supported by the network and carriers involved.
- **Illegal robocall:** A call that uses an autodialer or prerecorded/artificial voice message in violation of applicable laws or regulations.
- **Traceback request:** A request from an authorized traceback group, carrier, or authority to identify the origin and path of suspect call traffic.

## 8. Review and Updates

This policy will be reviewed at least annually and updated as needed to reflect changes in applicable law, industry standards, upstream carrier requirements, and ITSolutions|Currie operations.