

Robocall Mitigation Program

GrassRoots Technology Inc.

Overview

GrassRoots Technology Inc. is committed to preventing the origination and transmission of illegal robocalls and other unlawful telecommunications traffic on our network.

As a provider of hosted PBX, SIP trunking, and business telecommunications services, GrassRoots maintains policies, monitoring systems, and operational procedures designed to detect, mitigate, and prevent the use of our services for illegal robocalling, caller ID spoofing, or other fraudulent calling activity.

GrassRoots requires all customers and partners to comply with applicable telecommunications laws and regulations, including those governing unsolicited communications, caller identification accuracy, and consumer protection.

Network Role

GrassRoots Technology Inc. operates as a **facilities-based and hosted voice service provider** delivering business communications services to enterprise and SMB customers.

Our network supports:

- Hosted PBX services
- SIP trunking
- Unified communications platforms
- Business voice services delivered over managed IP networks

GrassRoots primarily serves **business customers** and does not provide mass outbound calling services or predictive dialing platforms.

Robocall Prevention Policies

GrassRoots maintains a strict **Acceptable Use Policy (AUP)** prohibiting customers from using our services for:

- Illegal robocalling
- Caller ID spoofing intended to mislead
- Telemarketing in violation of applicable laws
- Fraudulent calling activity
- Traffic pumping or artificial traffic generation

- Unsolicited automated calling campaigns without proper consent

Any customer found to be originating illegal robocalls or other unlawful traffic may have their services suspended or terminated immediately.

Traffic Monitoring and Detection

GrassRoots monitors voice traffic patterns across its network in order to detect abnormal or suspicious calling behavior.

Monitoring measures include:

- Call pattern analysis
- Call volume anomaly detection
- Rate and burst analysis
- Destination pattern monitoring
- Customer complaint review
- Upstream carrier notifications

These controls allow GrassRoots to quickly identify traffic patterns commonly associated with robocalling or fraudulent calling activity.

Investigation and Enforcement

When suspicious traffic is identified, GrassRoots initiates an investigation that may include:

- Traffic analysis
- Customer verification
- Review of account activity
- Coordination with upstream carriers

If illegal robocalling or fraudulent activity is confirmed, GrassRoots may take immediate action including:

- Call blocking
 - Traffic filtering
 - Account suspension
 - Service termination
 - Reporting to appropriate regulatory authorities
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Cooperation with Industry and Regulators

GrassRoots cooperates with upstream carriers, industry organizations, and regulatory bodies in order to combat illegal robocalling.

When appropriate, GrassRoots will respond to traceback requests and assist with investigations related to unlawful telecommunications activity.

Caller ID Authentication

Where technically feasible, GrassRoots supports the implementation of **STIR/SHAKEN caller ID authentication frameworks** to help verify the legitimacy of calls originating on our network.

Caller ID information transmitted through our network must accurately represent the originating party and may not be falsified or manipulated in violation of applicable regulations.

Customer Verification and Onboarding

GrassRoots maintains customer verification procedures designed to reduce the risk of fraudulent service use.

These procedures may include:

- Business identity verification
- Service use case review
- Credit and fraud screening
- Ongoing account monitoring

Customers may be required to provide additional documentation if high-risk calling patterns are detected.

Complaint Handling

GrassRoots investigates all credible complaints relating to robocalling, spam calling, or fraudulent telecommunications activity associated with our network.

Complaints may be submitted through:

- customer support channels
- upstream carrier reports
- regulatory complaints
- traceback requests

Each complaint is reviewed and investigated as appropriate.

Continuous Improvement

GrassRoots regularly reviews and updates its robocall mitigation practices to address emerging threats and industry developments.

Our goal is to maintain a secure and trusted telecommunications environment for customers, partners, and the public.

Contact Information

Questions regarding this Robocall Mitigation Program may be directed to:

GrassRoots Technology Inc.

Abuse / Network Operations

support@gograssroots.ca