



DCJS# 11-8932
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Robocall Mitigation Program Description Bailey Systems LLC

Bailey Systems LLC is a Voice over IP (VoIP) service provider offering telecommunications services to end-user customers.

STIR/SHAKEN Implementation

Bailey Systems LLC utilize an upstream service provider, SkySwitch, to provide call authentication services. All outbound calls are subject to STIR/SHAKEN authentication through these upstream providers, and Bailey Systems LLC relies on these providers for full implementation of the STIR/SHAKEN framework.

Robocall Mitigation Practice

Bailey Systems LLC has implemented a robocall mitigation program designed to prevent the origination of illegal robocalls and to ensure compliance with applicable FCC regulations. These practices include:

- **Customer Vetting (Know Your Customer):** Verification of customer identity and business legitimacy prior to service activation
- **Traffic Monitoring:** Ongoing monitoring of call patterns, volumes, and usage behavior to identify anomalies or suspicious activity
- **Analytics & Detection:** Identification of potentially illegal robocall traffic based on abnormal call frequency, short-duration calls, high call volumes, or other suspicious indicators
- **Enforcement Actions:** Immediate investigation of flagged activity and suspension or termination of customers engaged in illegal robocalling
- **Upstream Coordination:** Coordination with upstream providers to block or mitigate suspected illegal traffic when necessary

Traceback and Cooperation

Bailey Systems LLC commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group. The company will cooperate fully in investigations and take appropriate action to prevent further illegal traffic.

Upstream Provider Reliance

Bailey Systems LLC relies on its upstream providers for call routing, STIR/SHAKEN authentication, and additional robocall mitigation measures at the network level.