

Uptime Communications Robocall Mitigation Program Description

Date:

1. Description of Service and Role in Call Chain

The filing entity operates as a provider of interconnected VoIP services to business customers. The entity utilizes an underlying wholesale voice provider (CoreDial) to deliver services and does not own or operate the underlying telecommunications network infrastructure used to originate calls to the PSTN.

The filing entity is a reseller of voice services and does not directly control call origination at the network level. All calls are transmitted through its upstream provider, which is responsible for network-level call routing and authentication.

2. STIR/SHAKEN Implementation Status

The filing entity does not have a STIR/SHAKEN implementation obligation. STIR/SHAKEN authentication and call signing are performed by the upstream provider (CoreDial), which is responsible for implementing and maintaining STIR/SHAKEN compliance within its network.

3. Robocall Mitigation Practices

Customer Vetting and Onboarding:

- Verification of customer identity prior to service activation
- Validation of business legitimacy for commercial accounts
- Review of intended use cases for voice services

Acceptable Use Policy Enforcement:

- All customers are subject to an Acceptable Use Policy (AUP) that explicitly prohibits illegal robocalling, caller ID spoofing, and fraudulent communications
- Violations may result in suspension or termination of services

Traffic Monitoring and Analytics:

- Monitoring of call traffic patterns for anomalous behavior
- Investigation of suspicious activity

Traceback and Enforcement Cooperation:

- Commitment to respond to traceback requests within 24 hours
- Cooperation with investigations
- Prompt action against offending customers

Upstream Provider Reliance:

- Reliance on CoreDial for STIR/SHAKEN, authentication, and network-level controls

4. Mitigation of Illegal Traffic

If illegal robocall activity is identified, the filing entity will investigate, take corrective action including suspension, and cooperate with authorities and upstream providers.

5. Ongoing Compliance

The filing entity maintains internal policies and procedures to ensure compliance with FCC regulations including 47 CFR § 64.6305. Policies are reviewed and updated as needed.