

Robocall Mitigation Plan – ClearFone Technologies

1. Company Information

- **Company Name:** ClearFone Technologies
- **Contact Person:** Travis Swain, Owner
- **Email / Phone:** Travis@clearfone.ca - 7804986335
- **Business Type:** VoIP Provider

- **2. Purpose & Scope**

This plan outlines the measures our organization takes to prevent the origination, transmission, and termination of illegal robocalls on our network. It applies to all voice services provided to customers, including wholesale and retail operations.

3. Call Authentication Measures

- **Implement STIR/SHAKEN for IP-based calls where technically feasible.**
- **For non-IP traffic, apply robocall mitigation techniques such as:**
 - **Caller ID validation**
 - **Call pattern analysis**
 - **Known spam number blocking**

4. Traffic Monitoring & Analysis

- **Continuous monitoring of call traffic for abnormal patterns (e.g., high call volumes, short-duration calls).**
- **Automated alerts for suspicious activity.**
- **Manual review of flagged call records.**

5. Customer Vetting & Onboarding

- **Verify customer identity before service activation.**
- **Require terms of service prohibiting illegal robocalls.**
- **Conduct periodic audits of high-volume customers.**

6. Complaint Handling Process

- **Maintain a dedicated email/phone line for robocall complaints.**
- **Investigate complaints within 24–48 hours.**
- **Take corrective action, including suspension or termination of offending accounts.**

7. Reporting & Compliance

- **File required reports with the FCC/CRTC.**
- **Maintain records of mitigation activities for at least 24 months.**
- **Update this plan annually or when regulations change.**

8. Enforcement & Accountability

- **Assign a compliance officer responsible for plan execution.**
- **Provide staff training on robocall detection and prevention.**
- **Document all enforcement actions taken.**

9. Plan Review & Updates

- **Review plan effectiveness quarterly.**
- **Adjust strategies based on new threats, technologies, and regulatory updates.**