

Robocall Mitigation Program Description

Our company is a non-facilities-based Voice Service Provider that relies on upstream providers, including SkySwitch, for STIR/SHAKEN implementation and call authentication.

We do not directly implement STIR/SHAKEN within our own network infrastructure. Instead, we rely on our upstream provider to authenticate and sign calls in accordance with FCC requirements.

We have implemented internal robocall mitigation procedures, including:

- Customer onboarding verification and vetting procedures
- Monitoring of outbound and inbound call traffic patterns
- Detection of suspicious or anomalous call behavior
- Enforcement of acceptable use policies
- Immediate investigation and mitigation of suspected illegal robocall activity

We cooperate with upstream providers and industry traceback efforts, including responding promptly to traceback requests from the FCC, law enforcement, and the Industry Traceback Group.

Our mitigation practices are designed to prevent the origination and transmission of unlawful robocalls across our services.

We commit to complying with all applicable FCC regulations under the TRACED Act.