

Robocall Mitigation Program Description

Better Technology Services, LLC

Company Type

Better Technology Services, LLC is a **non-facilities-based voice service provider** that resells hosted VoIP services through a third-party platform (SkySwitch). The company does not own or operate telecommunications network infrastructure and relies on upstream providers for call routing, transmission, and network-level controls.

Better Technology Services, LLC allows outbound calling services but enforces strict controls to prevent illegal robocall activity.

STIR/SHAKEN Implementation Status

Better Technology Services, LLC has **not directly implemented STIR/SHAKEN** due to lack of control over the underlying network infrastructure required for implementation.

Caller ID authentication is performed by upstream providers, including SkySwitch and its underlying carrier partners. Better Technology Services, LLC ensures that its upstream providers are compliant with applicable STIR/SHAKEN requirements and industry standards.

Robocall Mitigation Program Description

Better Technology Services, LLC has implemented a comprehensive robocall mitigation program designed to proactively prevent, detect, and mitigate illegal robocall activity. This program includes customer vetting, contractual enforcement, traffic monitoring, and coordination with upstream providers.

1. Know Your Customer (KYC) and Risk-Based Onboarding

Better Technology Services, LLC performs risk-based due diligence prior to onboarding any customer, including:

- Verification of business identity (entity registration, ownership, and EIN where applicable)

- Validation of intended use of voice services, including whether outbound dialing will be used
- Risk assessment of customer use case, with heightened scrutiny applied to any high-volume outbound dialing activity

Customers identified as high-risk, including those intending to engage in large-scale outbound campaigns or automated dialing, are subject to enhanced review and may be denied service.

2. Customer Agreements and Enforcement Controls

All customers are contractually required to:

- Comply with the Telephone Consumer Protection Act (TCPA) and all applicable FCC regulations
- Refrain from originating or transmitting illegal robocalls or using misleading or spoofed caller ID information
- Use services only for lawful business purposes

Better Technology Services, LLC reserves the right to:

- Immediately suspend or terminate service upon detection of suspicious or unlawful activity
 - Restrict outbound calling capabilities where risk is identified
 - Report suspected illegal activity to appropriate authorities
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3. Traffic Monitoring, Detection, and Response

Better Technology Services, LLC actively monitors customer traffic patterns for indicators of illegal robocalling behavior, including:

- High-volume or high-velocity outbound call activity
- Abnormally short call durations or unanswered call patterns
- Repetitive dialing patterns consistent with automated dialing systems
- Sudden spikes or irregular traffic patterns

When suspicious activity is detected, Better Technology Services, LLC will:

- Immediately investigate the traffic
 - Restrict or suspend services as appropriate
 - Escalate the matter to upstream providers for further analysis and blocking
 - Terminate accounts where violations are confirmed
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4. Upstream Provider Oversight (SkySwitch)

Better Technology Services, LLC relies on SkySwitch and its underlying carrier partners for network-level robocall mitigation, including:

- STIR/SHAKEN caller ID authentication
- Call analytics and traffic filtering
- Blocking of suspicious, spoofed, or illegal traffic
- Enforcement of Do-Not-Originate (DNO) lists

Better Technology Services, LLC ensures that all upstream providers:

- Maintain robocall mitigation programs
- Comply with FCC requirements
- Are properly registered in the Robocall Mitigation Database where applicable

Better Technology Services, LLC does not accept or route traffic outside of its approved upstream provider ecosystem.

5. Mitigation of Illegal Traffic

Upon identification or notification of illegal or suspected illegal robocall traffic, Better Technology Services, LLC will:

- Investigate the source and nature of the traffic
- Immediately block or restrict the traffic where appropriate
- Suspend or terminate the responsible customer account
- Coordinate with upstream providers to prevent continued transmission

- Implement additional safeguards to prevent recurrence
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6. Traceback Cooperation

Better Technology Services, LLC commits to full cooperation with traceback efforts and will:

- Respond promptly to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group
 - Provide accurate and complete call detail information where available
 - Work with upstream providers to identify and trace the origin of suspicious traffic
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7. Analytics and Blocking Tools

Better Technology Services, LLC relies on SkySwitch and its underlying carrier partners to implement:

- Real-time call analytics and robocall detection systems
 - Blocking of invalid, unallocated, or spoofed numbers
 - Enforcement of Do-Not-Originate (DNO) lists
 - Industry-standard traffic filtering and mitigation controls
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Governance and Contact Information

Responsible Officer for Robocall Mitigation Compliance:

Name: Asher Fhima

Title: President

Email: asherfhima@gmail.com

Phone: 917-226-4891

Address: 424 Peninsula Blvd, Lynbrook, NY 11563

Prior Enforcement Actions Disclosure

Better Technology Services, LLC certifies that neither the company nor its principals have been subject to any formal FCC, law enforcement, or regulatory actions related to illegal robocalls or spoofing within the past two years.

Certification Statement

Better Technology Services, LLC certifies that:

- All voice traffic associated with its services is subject to a robocall mitigation program
- The company has implemented reasonable and effective measures to prevent illegal robocalls
- The company will respond to traceback requests and cooperate fully with enforcement authorities
- The company complies with all applicable FCC robocall mitigation requirements