

Robocall Mitigation Plan

Brown Dog Information Technology Solutions, LLC

FRN: 0031139553

Company Description

Brown Dog Information Technology Solutions LLC is a **non-facilities-based VoIP reseller** providing voice services to business customers via the SkySwitch platform.

We do **not directly interconnect with the PSTN**. Call origination, routing, and STIR/SHAKEN implementation are handled by our upstream provider (SkySwitch and its underlying carrier partners).

We assign telephone numbers (DIDs) to customers as part of our service offering.

STIR/SHAKEN Implementation Status

We are **not fully STIR/SHAKEN implemented**.

As a reseller, we do not control the network infrastructure required to implement STIR/SHAKEN and rely on our upstream provider (SkySwitch) for STIR/SHAKEN functionality where implemented.

Robocall Mitigation Practices

We take affirmative steps to prevent the origination of illegal robocalls, including the following:

Customer Vetting

- Collection and verification of customer identity, including business name, address, and contact information
- Verification of business registration where applicable
- Review of intended use of service
- Enhanced due diligence for high-volume or call center customers

Number Authorization

- Telephone numbers are assigned directly by us or authorized via a Letter of Authorization (LOA)
- Customers are restricted to using only numbers assigned or explicitly authorized
- Unauthorized caller ID spoofing is prohibited

Traffic Monitoring

We monitor for suspicious activity, including:

- Unusual outbound call volume
- Short-duration calls (low average call duration)
- Low answer-seizure ratios
- Sequential or repetitive dialing patterns

Mitigation Actions

When suspicious activity is detected, we:

- Restrict or suspend outbound calling
- Investigate customer activity
- Request supporting documentation where necessary
- Terminate service for confirmed violations

Traceback Cooperation

We cooperate with traceback requests from the Industry Traceback Group (ITG), law enforcement, and regulatory authorities.

We respond to traceback requests within **24 hours** and maintain records sufficient to identify the originating customer and provide relevant call detail records.

Record Retention

We retain relevant records, including:

- Customer onboarding documentation
- Number authorization (LOA) documentation

- Call Detail Records (CDRs)

Records are retained for a minimum of **12 months**.

Upstream Provider Reliance

We rely on **SkySwitch and its underlying carrier partners** for:

- PSTN interconnection
- STIR/SHAKEN implementation
- Call authentication frameworks

We ensure our upstream provider is listed in the FCC Robocall Mitigation Database.