

Robocall Mitigation Program Description

Nutech Digital – VoIP Provider

1. Program Overview

This document describes the robocall mitigation program implemented by Nutech Digital, a VoIP service provider offering voice-over-IP services. The program is designed to significantly reduce the origination, carrying, and transmission of illegal robocalls on our network, in compliance with the Federal Communications Commission's robocall and STIR/SHAKEN requirements under 47 CFR § 64.6305.

2. Scope of the Program

This robocall mitigation program applies to all voice calls originated or carried by Nutech Digital, including calls from our direct customers, resellers, and downstream partners connected to our VoIP platform. The program covers both inbound and outbound traffic that passes through our network infrastructure.

If Nutech Digital interconnects with any upstream voice service providers, we apply similar vetting and monitoring requirements to those providers. If not, the program is limited to our own customers and internal traffic.

3. Customer Vetting and Know-Your-Customer (KYC)

Before onboarding customers, Nutech Digital conducts basic Know-Your-Customer procedures, including:

- Collecting customer legal name, physical address, and contact information.
- Reviewing the customer's business purpose and expected call patterns where feasible.
- Requiring signed terms of service explicitly prohibiting illegal robocalling, spoofing, and misuse of the network.

Customers exhibiting suspicious behavior during onboarding (e.g., reticence to provide contact information, high-risk call patterns, or history of prior abuse) may be rejected or subject to additional review before being allowed to originate traffic.

4. STIR/SHAKEN Implementation

Nutech Digital is working toward implementing STIR/SHAKEN for call authentication on our network.

- Where available, we generate or pass STIR/SHAKEN signatures for outbound calls in accordance with industry standards.
- Where STIR/SHAKEN is not yet fully deployed, we mitigate illegal robocalls using technical and operational measures described below, and will update this program as our STIR/SHAKEN deployment progresses.

(If you already have STIR/SHAKEN, change this to: "Nutech Digital originates all outbound calls with full STIR/SHAKEN attestation as required by FCC rules.")

5. Call Monitoring and Analytics

Nutech Digital continuously monitors call traffic on our VoIP platform for patterns consistent with illegal robocalling, including:

- Excessive call volumes or rapid call-setup rates.
- Large numbers of short-duration calls, unusually high call-completes-per-second, or repeated attempts to blocked prefixes.
- Concentrated traffic to high-spam or high-complaint destinations.

We analyze call detail records and traffic-rate trends to identify potential abuse and investigate such patterns promptly. Where applicable, we may use internal or third-party analytics tools to flag and help block suspicious traffic.

6. Blocking, Filtering, and Upstream Providers

As part of our mitigation program, Nutech Digital implements traffic-based controls to reduce illegal robocalls, including:

- Blocking or rate-limiting specific customers, prefixes, or routes based on thresholds for volume, call-per-second, or other abuse indicators.
- Using internal or third-party reputation-based or blacklist tools to prevent or limit the processing of known spam or scam numbers.
- Applying call-routing policies that favor legitimate, authenticated traffic and reduce the impact of unknown or suspicious traffic.

If Nutech Digital interconnects with upstream voice service providers, such providers are subject to review and may be restricted or terminated if they repeatedly send abusive or illegal robocall traffic. If Nutech Digital does not carry traffic from other upstream voice service providers, this program focuses solely on our own customers and internal traffic.

7. Traceback and Enforcement Cooperation

Nutech Digital commits to cooperating with traceback efforts and enforcement authorities.

- Upon receipt of a traceback request or enforcement notice, we will promptly investigate the reported traffic and, to the extent feasible, provide relevant information to the FCC or other authorized parties within 24 hours.
- We maintain call detail records and logs in accordance with our record-retention policies and applicable FCC rules.

8. Complaint Handling and Customer Termination

Nutech Digital takes complaints about robocalls seriously and has documented procedures to:

- Investigate reports of suspected illegal robocalls tied to our network.
- Notify and, where appropriate, warn, restrict, or terminate customers engaged in abusive calling behavior.
- Update internal policies and measures based on lessons learned from complaints and enforcement notices.

Customers who repeatedly violate our terms of service or are found to be sourcing or generating illegal robocall traffic may be permanently terminated and reported to appropriate authorities as required.

9. Record-Keeping and Ongoing Review

Nutech Digital maintains call detail records and related documentation in accordance with our record-retention policies and applicable FCC requirements.

- This robocall mitigation program is reviewed at least annually, or when significant changes occur to our network, customer base, or traffic patterns.
- Our staff responsible for network operations and customer management are trained to recognize and respond to potential robocall abuse and to update the program as new technologies and FCC requirements become available.