

Schwartz Networks LLC – Robocall Mitigation Program Description

Schwartz Networks LLC is a voice service provider that offers hosted PBX and SIP-based voice services to business customers. The company originates calls on behalf of its customers using upstream carrier partners that implement STIR/SHAKEN caller ID authentication.

STIR/SHAKEN Implementation:

Schwartz Networks LLC does not directly implement STIR/SHAKEN signing within its own network. Instead, the company relies on its upstream voice service providers to perform STIR/SHAKEN authentication and call signing where supported. Schwartz Networks LLC ensures that it only partners with reputable upstream providers that support industry-standard caller ID authentication frameworks.

Customer Vetting and Know Your Customer (KYC):

Schwartz Networks LLC implements procedures to verify the identity of all customers prior to service activation. This includes collecting business identification information, validating customer contact details, and reviewing the intended use of services. Services are not provisioned to customers who fail to provide sufficient or verifiable information.

Traffic Monitoring and Analytics:

The company monitors call traffic patterns for anomalies indicative of illegal robocalling or spoofing. This includes monitoring for:

- High call volume spikes
- Short duration calls
- High call failure rates
- Unusual calling patterns or destinations

Automated and manual review processes are used to identify suspicious behavior.

Abuse Prevention and Enforcement:

Schwartz Networks LLC maintains and enforces an Acceptable Use Policy that prohibits:

- Illegal robocalling
- Caller ID spoofing
- Fraudulent or deceptive practices

If suspicious or illegal activity is detected, the company will take immediate action, including:

- Rate limiting
- Temporary suspension of services
- Termination of customer accounts

Traceback Cooperation:

Schwartz Networks LLC responds promptly to all traceback requests from the FCC, law enforcement, and the USTelecom Industry Traceback Group. The company commits to responding fully and within 24 hours to any such requests and will cooperate in investigating and mitigating illegal call activity.

Upstream Provider Coordination:

Schwartz Networks LLC works closely with its upstream providers to ensure compliance with all robocall mitigation requirements. This includes adherence to upstream policies regarding traffic origination, caller ID validation, and call authentication.

Record Retention:

The company maintains call detail records (CDRs) and related logs sufficient to support traceback investigations and internal monitoring. Records are retained for a reasonable period in accordance with industry best practices.

Continuous Improvement:

Schwartz Networks LLC regularly reviews and updates its robocall mitigation practices to align with evolving FCC requirements, industry standards, and emerging threats.

Conclusion:

Schwartz Networks LLC is committed to preventing illegal robocalls and spoofing on its network and to maintaining full compliance with FCC robocall mitigation requirements.