

Robocall Mitigation Program Description

Prepared by: Connectra Technologies Inc.

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Prepaid Date:

1. Company Overview

Connectra Technologies Inc. is a non-facilities-based voice service provider offering VoIP services to business customers. The company operates as a reseller using hosted VoIP platforms such as SkySwitch/CoreDial and relies on upstream carriers for call transmission and authentication.

2. STIR/SHAKEN Implementation Status

Connectra Technologies Inc. does not directly implement STIR/SHAKEN authentication. As a non-facilities-based provider, the company relies on upstream carriers and platform providers to perform STIR/SHAKEN authentication in accordance with FCC requirements.

3. Customer Vetting (KYC)

Connectra Technologies Inc. implements a Know Your Customer (KYC) process prior to activating services, including:

- Verification of business registration and identity
- Validation of contact information and service usage
- Review of intended use of voice services
- Risk assessment for high-volume outbound calling

4. Acceptable Use Policy

All customers must comply with strict acceptable use policies that prohibit:

- Illegal robocalling
 - Caller ID spoofing
 - Fraudulent or misleading communications
 - Violations of applicable laws including the Telephone Consumer Protection Act (TCPA)
- Violations result in immediate suspension or termination of services.

5. Traffic Monitoring and Analytics

The company monitors network traffic to detect suspicious behavior, including:

- High call volume anomalies
- Short duration or repetitive call patterns

- Unusual geographic calling patterns

Monitoring is performed using platform tools and carrier-provided analytics.

6. Call Blocking and Mitigation Actions

Connectra Technologies Inc. takes immediate action upon detecting suspicious traffic, including:

- Blocking or rate-limiting outbound calls
- Suspending or terminating customer accounts
- Escalating incidents to upstream providers

7. Traceback Cooperation

The company cooperates fully with traceback requests from the FCC, law enforcement, and industry traceback consortiums. Responses are provided within 24 hours, including relevant call detail records and customer information.

8. Record Retention

Records are maintained for a minimum of two years, including:

- Customer onboarding documentation
- Call detail records (CDRs)
- Complaint logs and investigation records

9. Continuous Compliance

Connectra Technologies Inc. regularly reviews and updates its robocall mitigation practices to align with FCC regulations and industry standards.

10. Certification

Connectra Technologies Inc. certifies that it has implemented the above robocall mitigation program and takes reasonable steps to prevent the origination of illegal robocalls.