

Sloan Technologies LLC

Robocall Mitigation Program Description

(47 CFR §64.6305(a))

Provider Profile

Sloan Technologies LLC is a non-facilities-based reseller of interconnected VoIP services delivering cloud-based PBX services to business customers. Sloan does not operate its own STIR/SHAKEN signing infrastructure and files under the no STIR/SHAKEN implementation certification consistent with 47 CFR §64.6305(a).

Upstream Authentication Reliance

Sloan relies on underlying upstream voice service provider partners, including ClearlyIP and VoIP.ms, for STIR/SHAKEN caller authentication where applicable.

1. Customer Vetting and Onboarding

Sloan performs customer verification during onboarding, including validation of:

- Business identity
- Intended use of services
- Customer use case consistent with lawful communications practices

Customers are prohibited from using Sloan services for unlawful robocalling, spoofing, or abusive traffic generation.

2. Traffic Monitoring and Robocall Mitigation

Sloan maintains continuous monitoring of call activity across managed systems, including:

- Call volume monitoring
- Call duration pattern analysis
- Dialing behavior review
- Automated alerting for suspicious or potentially abusive traffic patterns, including:
 - Sudden outbound call spikes
 - High-volume short-duration calling bursts
 - Other anomalous traffic associated with robocalling activity

3. Immediate Abuse Response Controls

Because customer PBX systems are hosted and managed within Sloan's infrastructure, Sloan can take immediate mitigation action when suspicious activity is detected, including:

- Real-time suspension of outbound calling
- Disabling specific trunks or call paths
- Isolation of customer systems to prevent further origination
- Suspension or termination of customers engaged in unlawful robocalling

4. Call Reputation and Number Registration Practices

Customers are encouraged or required, where applicable, to register outbound calling numbers with recognized industry call reputation and anti-spam frameworks, including:

- Free Caller Registry
- First Orion
- Hiya
- TNS Call Guardian

These measures help support legitimate calling identification and reduce false spam labeling.

5. Traceback Cooperation

Sloan commits to:

- Respond fully to traceback requests within 24 hours
- Cooperate with the Commission, law enforcement, and the industry traceback consortium
- Investigate and take action regarding suspected illegal robocall activity

6. Compliance Commitment

Sloan maintains and follows a robocall mitigation program consistent with 47 CFR §64.6305(a) and related FCC robocall mitigation obligations, taking reasonable steps to prevent illegal robocalls from originating through its services.

Executed by:

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