



Wire Safe Solutions

Robocall Mitigation Program (RMP) Description

Prepared for the Federal Communications Commission (FCC) Robocall Mitigation Database

1. Overview and Provider Status

Wire Safe Solutions operates as a non-facilities-based interconnected Voice over Internet Protocol (VoIP) service provider. This Robocall Mitigation Program (RMP) details the specific reasonable steps Wire Safe Solutions takes to prevent the origination and routing of illegal robocalls on its network, in compliance with 47 CFR § 64.6305(d) and related FCC directives.

Wire Safe Solutions does not own, operate, or maintain the underlying IP network infrastructure, Session Border Controllers (SBCs), or SIP signaling capabilities necessary to

independently obtain an SPC token or digitally sign calls. Therefore, Wire Safe Solutions lacks a direct STIR/SHAKEN implementation obligation. Our outbound PSTN traffic is originated via 3CX private branch exchange (PBX) systems and routed directly to our underlying facilities-based carrier, **Voxtelesys**. Voxtelesys possesses the necessary network infrastructure and actively implements STIR/SHAKEN caller ID authentication on our behalf.

Despite lacking a direct STIR/SHAKEN obligation, Wire Safe Solutions is strictly committed to mitigating illegal robocalls and has implemented a comprehensive mitigation program as detailed below.

2. Robocall Mitigation Practices

Wire Safe Solutions employs a multi-layered approach to robocall mitigation, focusing on stringent onboarding, active monitoring, and strict contractual enforcement.

A. "Know Your Customer" (KYC) and Vetting Procedures Before provisioning any voice services, Wire Safe Solutions conducts a thorough vetting process to ensure the legitimacy of the prospective customer. Our KYC procedures include:

- Collecting and verifying the physical business address of the customer.
- Obtaining and validating a Federal Tax Identification Number (EIN) or valid state corporate registration.
- Identifying a primary administrative contact and verifying their contact information (phone number and email address).
- Evaluating the customer's intended use of the voice service to identify high-risk traffic profiles (e.g., auto-dialing, telemarketing, or mass broadcasting). Wire Safe Solutions reserves the right to refuse service to any entity whose business model suggests a high risk of originating illegal robocall traffic.

B. Contractual Obligations and Acceptable Use Policy (AUP) All customers must agree to Wire Safe Solutions' Terms of Service and Acceptable Use Policy prior to utilizing our network. These agreements include:

- An explicit prohibition against the origination of illegal robocalls, illegal telemarketing, and fraudulent caller ID spoofing.
- A requirement that the customer must have the legal right to use the Caller ID number(s) presented on their outbound calls.

- Clear provisions granting Wire Safe Solutions the right to immediately suspend or permanently terminate service without notice if the customer is found to be originating illegal traffic or violating the AUP.

C. Traffic Monitoring and Analytics Wire Safe Solutions, in conjunction with our underlying carrier Voxtelesys, actively monitors outbound traffic patterns to detect anomalies indicative of illegal robocalling. Metrics monitored include:

- High volumes of calls originating outside of standard business hours.
- Extremely high volumes of short-duration calls (e.g., calls lasting fewer than 6 seconds) or low call-completion ratios (ASR).
- Use of invalid, unassigned, or Do-Not-Originate (DNO) Caller ID numbers.

If suspicious traffic patterns are detected, Wire Safe Solutions initiates an immediate internal investigation to determine the nature of the traffic and whether mitigation action is required.

3. Incident Response and Traceback Cooperation

Wire Safe Solutions is fully committed to cooperating with industry and regulatory bodies to trace the origin of illegal calls.

- **Traceback Compliance:** Wire Safe Solutions pledges to respond promptly to all traceback requests from the Industry Traceback Group (ITG), the FCC, law enforcement agencies, and our upstream carrier (Voxtelesys).
- **24-Hour Response Time:** We commit to investigating and responding to all official traceback requests within twenty-four (24) hours of receipt.
- **Mitigation Actions:** If a traceback request or internal monitoring confirms that a customer is originating illegal robocalls, Wire Safe Solutions will take immediate action, which may include the immediate suspension of the offending SIP trunk, blocking specific originating numbers, or the permanent termination of the customer's account.