

Infinitem Communications LLC

Robocall Mitigation Program Description

Infinitem Communications LLC ("Infinitem") is an interconnected Voice over Internet Protocol ("VoIP") service provider utilizing hosted SIP interconnection, hosted routing arrangements, and IP-based telecommunications infrastructure. Infinitem currently utilizes commercially reasonable robocall mitigation practices and hosted carrier relationships to reduce the risk of illegal robocalls, spoofing, fraud, and abusive telecommunications activity.

1. Customer Verification and Know-Your-Customer Procedures

Infinitem utilizes customer verification procedures and commercially reasonable Know-Your-Customer ("KYC") practices designed to reduce the risk of fraudulent activity, spoofing, unlawful robocalls, and abuse of telecommunications services.

2. Abuse Monitoring and Traffic Analysis

Infinitem monitors traffic patterns, customer behavior, and usage activity for indicators of suspicious or unlawful telecommunications traffic. Infinitem reserves the right to suspend, terminate, or investigate accounts associated with abusive or unlawful activity.

3. Cooperation with Upstream Providers

Infinitem utilizes hosted SIP trunking and hosted routing arrangements through commercial carrier relationships and cooperates with upstream providers regarding traceback requests, suspicious traffic investigations, and robocall mitigation efforts.

4. Anti-Spoofing and Robocall Mitigation

Infinitem utilizes commercially reasonable anti-spoofing and robocall mitigation measures, including customer verification, abuse response procedures, and cooperation with industry traceback efforts.

5. STIR/SHAKEN

Infinitem does not currently operate its own STIR/SHAKEN authentication infrastructure and therefore does not presently have a STIR/SHAKEN implementation obligation applicable to its current hosted network configuration. Infinitem intends to implement STIR/SHAKEN where applicable and technically feasible as its network and operational infrastructure evolve.

6. Traceback Cooperation

Infinitem commits to respond promptly and cooperate with lawful traceback requests from the Federal Communications Commission, law enforcement agencies, industry traceback consortiums, and upstream carrier partners.

7. Network Architecture

Infinitem utilizes hosted SIP interconnection, hosted routing arrangements, and FreeSWITCH-based IP communications infrastructure. The company utilizes OCN 218M, IAC code IZF, and CLLI ALHBCANBDS0.

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IAC	IZF
CLLI	ALHBCANBDS0
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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Jun Wang
Authorized Representative
Infinitem Communications LLC