



Robocall Mitigation Plan for Gravity IT Solutions

Company Name: Gravity IT Solutions
FCC Registration Number (FRN): 0038313946
Date Revised: May 31, 2026
Filer Category: Voice Service Provider (Reseller)

1. STIR/SHAKEN Implementation & Exemption

Gravity IT Solutions is a non-facilities-based reseller of Voice over IP (VoIP) services. We certify that we have no STIR/SHAKEN implementation on our own network and have selected Option 3 in the Robocall Mitigation Database.

- **Exemption Basis:** As a reseller, we do not own or control the underlying switching infrastructure required to obtain an SPC token or apply digital signatures to call headers.
- **Upstream Compliance:** We partner with SkySwitch as our upstream provider. We rely on SkySwitch to perform STIR/SHAKEN authentication for calls originated through their platform.

2. Know Your Customer (KYC) Procedures

Our customer base consists entirely of small businesses (typically under 50 users). We implement the following "Know Your Customer" protocols to ensure we do not originate illegal traffic:

- **Identity Verification:** We verify every new customer's legal identity using government-issued business registrations (such as an EIN) and a physical service address.
- **Use Case Review:** We manually review the intended use of our voice services. We do not provide service to high-volume autodialers, telemarketing firms, or international call centers.
- **Small Business Focus:** Our typical client profile is a small business with under 10 employees, which allows for high-touch relationship management and easier detection of unusual account behavior.

3. Robocall Mitigation & Analytics Systems

In compliance with 47 CFR § 64.6305, we utilize the following specific systems and analytics provided by our upstream platform to identify and block illegal traffic:

- **Nomorobo Integration:** We utilize Nomorobo for real-time identification and intercepting of known robocall signatures and spam patterns.



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- **SkySwitch Fraud Alert System:** We utilize an automated real-time monitoring and notification system that alerts us to unusual spikes in call volume or high-cost destination patterns.
- **SkySwitch Fraud Management System:** We employ outbound throttling controls, including "Max Calls per Second" (CPS) and "Concurrent Call Limits," to prevent any single account from being used for high-volume robocalling.
- **SkySwitch PSTN Management Portal:** We utilize this proprietary portal to perform manual network security tasks, such as IP whitelisting for SIP traffic and the default blocking of high-risk international dialing routes.

4. Traceback Cooperation

Gravity IT Solutions is fully committed to the industry's traceback efforts and the security of the public switched telephone network (PSTN).

- **Response Timeline:** We commit to responding to all traceback requests from the FCC, law enforcement, or the Industry Traceback Group (ITG) within 24 hours of receipt.
- **Enforcement:** We reserve the right to immediately suspend or terminate service to any customer found to be originating illegal robocalls, as outlined in our Master Service Agreement.

5. Prior Regulatory Action Statement

In accordance with 47 CFR § 64.6305(a), Gravity IT Solutions certifies the following:

- **No Prior Actions:** At no time in the prior two years has Gravity IT Solutions (nor any entity for which Gravity IT Solutions shares common ownership, management, directors, or control) been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation regarding illegal robocalls, fraudulent spoofing, or a deficient Robocall Mitigation Database certification.
- **Continued Compliance:** We remain in good standing with all relevant regulatory bodies and have not been prohibited from filing in the Robocall Mitigation Database at any time.

6. Point of Contact

For all robocall mitigation and traceback inquiries, please contact:

- **Name:** Bryant Troupe
- **Title:** Owner
- **Email:** btroupe@gravityit.net
- **Phone:** (916) 945-2150