

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Imecom Group Inc.

Effective Date: June 22, 2025

1. Company Information

Legal Company Name: Imecom Group Inc.
Filing Type: Voice Service Provider
Program Type: Robocall Mitigation Program

2. Program Overview

This Robocall Mitigation Program Description is submitted pursuant to 47 CFR § 64.6305 and the FCC's rules implementing the TRACED Act, for inclusion in the FCC Robocall Mitigation Database.

Imecom Group Inc. has not implemented the STIR/SHAKEN call authentication framework on its network. In accordance with FCC rules, Imecom Group Inc. therefore submits this Robocall Mitigation Program Description detailing the specific, affirmative steps the company takes to prevent the origination of illegal robocall traffic on its network in lieu of STIR/SHAKEN implementation.

3. STIR/SHAKEN Implementation Status

Imecom Group Inc. has not implemented STIR/SHAKEN call authentication. Pursuant to 47 CFR § 64.6301(a) and the Commission's First Caller ID Authentication Report and Order, the STIR/SHAKEN implementation obligation applies only to providers that have control over the network infrastructure necessary to implement the framework.

The filer is a non-facilities-based reseller of voice services and does not own or operate the underlying network infrastructure necessary to directly implement the STIR/SHAKEN framework as described in 47 CFR § 64.6300. The filer provides hosted PBX and SIP-based voice services to business customers using numbering resources and PSTN connectivity obtained through upstream voice service providers.

The filer relies on its upstream carriers to perform STIR/SHAKEN authentication and call signing where applicable. The filer does not control the network elements responsible for STIR/SHAKEN implementation and does not possess the ability to obtain or use an SPC token directly. Accordingly, the filer is not positioned to independently implement STIR/SHAKEN on network facilities it does not own or operate.

4. Robocall Mitigation Measures

In lieu of STIR/SHAKEN implementation, Imecom Group Inc. has implemented the following specific, affirmative measures to prevent the origination of illegal robocall traffic on its network:

(a) Customer Contracts and Acceptable Use Policies

All customers are required to execute written agreements that expressly prohibit the use of Imecom Group Inc.'s network for illegal robocalling, caller ID spoofing, or any violation of the Telephone Consumer Protection Act (TCPA), Truth in Caller ID Act, or any applicable federal or state law governing telephone solicitations and automated calls.

(b) Call Traffic Monitoring and Analysis

Imecom Group Inc. monitors call traffic patterns on an ongoing basis to identify anomalies that may indicate illegal robocall activity.

(c) Traceback Cooperation

Imecom Group Inc. cooperates fully with traceback requests submitted by the USTelecom Industry Traceback Group (ITG), the FCC, and law enforcement agencies. The company commits to responding to traceback requests within 24 hours to the extent technically feasible, and to providing all available call detail records necessary to trace the origin of suspected illegal robocall traffic.

(d) Customer Remediation

Upon identification of a customer originating illegal robocall traffic, Imecom Group Inc. takes prompt remedial action, which may include issuing a written warning and cease-and-desist notice, implementing traffic blocks on specific numbers or call patterns, suspending the customer's service, or terminating the customer relationship entirely, depending on the severity and nature of the violation.

(e) Upstream Provider Screening

Imecom Group Inc. will not knowingly accept traffic from voice service providers that are not listed in the FCC Robocall Mitigation Database, consistent with FCC rules requiring providers to implement blocking of traffic from non-listed providers.

(f) Caller ID Verification

Imecom Group Inc. takes reasonable steps to verify that customers are authorized to use the caller ID numbers they submit for outbound calls, and prohibits the submission of spoofed or unauthorized caller ID information on its network.

(g) Employee Training and Compliance

Imecom Group Inc. ensures that personnel responsible for network operations, customer onboarding, and compliance are trained on the company's robocall mitigation obligations, the identification of suspicious traffic patterns, and internal escalation and remediation procedures.

5. Cooperation with Law Enforcement and Regulatory Authorities

Imecom Group Inc. is committed to full cooperation with the Federal Communications Commission, the Federal Trade Commission, the Department of Justice, state attorneys general, and the USTelecom Industry Traceback Group in connection with any investigation into illegal robocall traffic originating on or transiting its network. The company maintains call detail records sufficient to support traceback investigations and will provide such records upon lawful request.

Imecom Group Inc. will also take action against upstream providers or customers identified through regulatory or law enforcement action as sources of illegal robocall traffic, including implementing traffic blocks and terminating service as appropriate.

6. Point of Contact

The following individual is designated as the point of contact for matters relating to this Robocall Mitigation Program, including receipt of and response to traceback requests and regulatory inquiries:

Company:	Imecom Group Inc.
Role:	Product Manager
Address:	436 Governor Wentworth Highway, Melvin Village, NH, United States
Email:	compliance@imecomgroupinc.com
Phone:	603-569-0600

7. Certification

I, the undersigned, am an authorized officer of Imecom Group Inc. and hereby certify under penalty of perjury that Imecom Group Inc. has not implemented STIR/SHAKEN call authentication on its network, and that the Robocall Mitigation Program described in this document represents the specific, affirmative steps Imecom Group Inc. has implemented to prevent the origination of illegal robocall traffic on its network, in compliance with 47 CFR § 64.6305.

Imecom Group Inc. further certifies that the information provided in this filing is accurate and complete, and acknowledges its obligation to update this filing upon any material change in its robocall mitigation practices.

Authorized Signature: _____

Printed Name: _____

Title: _____

Date: _____