

Bovaird Telecom Robocall Mitigation Plan

1. Introduction & Purpose

Bovaird Telecom Inc. ("Company") submits this Robocall Mitigation Plan ("Plan") pursuant to the Federal Communications Commission's (FCC) rules under the TRACED Act and 47 CFR § 64.6305. The Company acts as a **Voice Service Provider** and is committed to preventing the origination and transmission of illegal robocalls on its network.

2. STIR/SHAKEN Implementation Status

- The Company has fully implemented the STIR/SHAKEN caller ID authentication framework across all of its IP-based network infrastructure.

3. Know Your Customer (KYC) & Upstream Procedures

The Company takes affirmative, effective measures to ensure its services are not utilized by bad actors:

- **Customer Vetting:** Before onboarding new customers or renewing existing agreements, the Company verifies business identity, physical address, and corporate registration.
- **Contractual Enforcement:** Customer service agreements explicitly prohibit the transmission of illegal robocalls, spoofed caller IDs, or fraudulent traffic. Violations result in immediate suspension or termination of service.

4. Call Analytics & Mitigation Tactics

The Company employs the following technical mechanisms to proactively detect, block, and mitigate illegal call traffic:

- **Call Analytics:** The Company utilizes Netsapiens to monitor network Call Detail Records (CDRs) for suspicious spikes and automated patterns.
- **Invalid Number Blocking:** The Company automatically blocks outbound traffic displaying invalid, unallocated, or unassigned caller IDs, as well as numbers listed on the Industry "Do Not Originate" (DNO) registry.
- **Rate Limiting:** Network thresholds are enforced to prevent single end-user lines from generating an unrealistic volume of concurrent calls or short-duration attempts.

5. Industry Traceback Cooperation

The Company fully cooperates with law enforcement and the official industry traceback group:

- **Point of Contact:** The Company has designated a dedicated regulatory response team to handle emergency network alerts.
- **Response Mandate:** Upon receipt of an official Industry Traceback Group (ITG) request, the Company commits to investigating and responding to the request within the legally required timeframe (typically under 24 hours).

6. Verification and Maintenance

The Company will continuously audit the efficacy of this Plan. In compliance with FCC rules, the Company will formally update this document within **10 business days** of any material change to its network capabilities or corporate mitigation practices.

Authorized Officer Signature: Aaron Dyck
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Date: 2026-06-23