

Robocall Mitigation Program Description Corvannis LLC

Overview

Corvannis LLC is a non-facilities-based UCaaS reseller operating on the SkySwitch white-label platform. Corvannis provides hosted voice communications services to small and medium-sized businesses. Because Corvannis does not own or operate any underlying network infrastructure, switching equipment, or IP transport facilities, STIR/SHAKEN call authentication is performed by SkySwitch, the facilities-based wholesale platform provider underlying Corvannis's service offerings.

Know Your Customer (KYC) / Customer Onboarding

Corvannis implements the following measures to prevent new and renewing customers from using its service to originate illegal robocall traffic:

- All prospective customers are required to provide verifiable business identity information prior to service activation, including legal business name, physical address, and contact information.
- Corvannis verifies that customers are legitimate business entities prior to provisioning service.
- Service agreements presented to all customers explicitly prohibit the use of Corvannis's services for illegal robocalling, spoofing, or any activity in violation of the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, or any applicable federal or state law.
- Corvannis reserves the right to immediately suspend or terminate service to any customer found to be originating illegal or fraudulent call traffic.

Know Your Upstream Provider

Corvannis obtains voice services exclusively through SkySwitch, a licensed and registered wholesale UCaaS platform provider with an active filing in the FCC Robocall Mitigation Database. Corvannis has verified SkySwitch's RMD registration status and will continue to monitor it on an ongoing basis. Corvannis does not accept voice traffic from any upstream provider that does not appear in the Robocall Mitigation Database.

Monitoring and Response

- Corvannis monitors customer accounts for anomalous call volume or patterns that may indicate illegal robocall activity.
- Upon identifying suspicious activity, Corvannis will take prompt action including customer notification, traffic suspension, and service termination as appropriate.
- Corvannis commits to responding fully and within 24 hours to all traceback requests received from the FCC, law enforcement agencies, and the Industry Traceback Group (ITG), and to cooperating fully with any investigation into illegal robocalling activity originating from its network.

Cooperation with Enforcement

Corvannis will cooperate fully with the FCC, federal and state law enforcement agencies, and the industry traceback consortium in investigating and stopping any illegal robocallers that use its service. Corvannis will maintain records sufficient to support traceback investigations and will designate a point of contact responsible for receiving and responding to traceback requests.

Commitment

Corvannis certifies that all calls it originates are subject to this robocall mitigation program, and that this program includes reasonable steps to avoid originating illegal robocall traffic consistent with 47 CFR § 64.6305(a).