

BOOAH LLC d/b/a SVITCH

Robocall Mitigation Program Description

FCC Registration Number (FRN): 0039002316

Address: 6479 US Highway 9, Howell, NJ 07731-3387

Robocall mitigation contact: Yechiel Katzman, Managing Member

Telephone: 732-610-1200 | Email: traceback@booahllc.com (also monitored: jack@booahllc.com)

Adoption date: [date of FCC filing]

1. Provider and scope

BOOAH LLC, doing business as SVITCH ("BOOAH"), provides hosted PBX and VoIP business telephone service to end users. BOOAH does not own or control the network facilities that originate calls onto the public switched telephone network. It obtains wholesale voice service from upstream carriers. This program applies to all calls handled through SVITCH, including BOOAH's own use and all new and renewing customer accounts. BOOAH currently uses Twilio as its wholesale voice carrier. BOOAH plans to add Bulk Solutions LLC (BulkVS) as an additional wholesale carrier. BulkVS is not yet in use.

2. Responsibility and traceback response

Yechiel Katzman, Managing Member, is the officer responsible for this program. BOOAH designates traceback@booahllc.com as its contact for traceback requests. BOOAH will monitor that mailbox every day, including weekends and holidays, through an automated attendant that opens a case, records the time of receipt and alerts the responsible officer.

BOOAH will respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement and the industry traceback consortium, and will cooperate with those entities in investigating and stopping illegal robocallers that use its service. The automated attendant will give call-specific information only to a requester whose identity BOOAH has verified through independent, official channels. It will not give customer or call information to any unverified sender. Requests that are unclear, or that fall outside what the attendant is authorized to do, will be sent to the responsible officer for handling.

3. New and renewing customer checks

Before activating outbound calling for a customer, BOOAH will record the customer's business name, a verified and reachable contact, a website, registration or other reasonable proof that the business is real, its intended calling use and its approximate daily call volume. BOOAH will obtain proof of the customer's right to use each caller-ID number presented, and the customer's agreement to make lawful calls only, not to spoof caller ID, and to accept suspension for abuse. BOOAH will recheck a customer on a change in ownership or use, a spike in traffic, or a complaint. BOOAH will hold activation until identity or number-use questions are resolved. BOOAH will keep a dated review note and supporting evidence.

4. Caller-ID and acceptable-use controls

BOOAH will permit only caller-ID numbers that BOOAH has assigned to the customer or that the customer has shown it is authorized to use. BOOAH will require customers to comply with applicable robocall, spoofing and telemarketing laws, and will prohibit unlawful robocalls, deceptive caller ID and attempts to evade abuse controls. BOOAH may suspend or terminate service for abuse.

5. Wholesale carriers and call authentication

BOOAH has not implemented STIR/SHAKEN itself and does not control the network infrastructure needed to do so. Its wholesale carriers originate BOOAH's outbound calls onto the public network and authenticate them under their own obligations. Before it begins using any new wholesale carrier, including BulkVS, BOOAH will confirm the carrier's identity, its listing in the Robocall Mitigation Database, the call path and its mitigation arrangements. BOOAH will update this plan and its FCC filing within 10 business days of any change.

6. Call monitoring

The responsible officer, or a person he designates, will review the previous day's outbound call records every calendar day. BOOAH will also review patterns weekly and its controls monthly. BOOAH will look at call volume against each customer's declared baseline, repeated short calls, unusual destinations, unauthorized caller IDs, complaints and carrier notices. BOOAH will open a review when a customer's daily volume is more than twice its declared baseline or more than twice its trailing seven-day average, when call volume is meaningful. Repeated short calls and clusters of complaints will also trigger review. BOOAH will adjust these thresholds to reflect legitimate customer use.

7. Upstream provider procedures

BOOAH will identify each wholesale provider by its legal name and contact details, check that provider's current Robocall Mitigation Database listing, and keep a record of the relationship. BOOAH will recheck on any material change.

8. Investigating and stopping abuse

BOOAH will promptly review complaints, traceback requests and carrier alerts. It will obtain a customer's explanation and supporting records, and will restrict the affected customer's outbound calling while it investigates when it finds confirmed illegal calling, an unauthorized caller ID, a credible carrier abuse notice or an unresolved high-risk identity discrepancy. BOOAH will suspend or terminate service to a customer for confirmed illegal traffic. It will coordinate with its wholesale carrier and with relevant authorities. BOOAH will not restore a customer's service until the cause has been corrected and verified, and it will review that customer more closely afterward.

9. Records and review

BOOAH will keep a daily export of SVITCH call metadata and reconcile it with carrier records. It will keep call metadata for 12 months, customer identity and number-authorization records for the length of service plus 12 months, and complaint and traceback case records for 24 months after the case closes. BOOAH will keep records longer where a lawful request or hold requires it. BOOAH will review this plan whenever its service, call paths, controls or contact information change, will update its FCC filing within 10 business days of a material change, and will recertify during the FCC's annual window of February 1 to March 1.