

Robocall Mitigation Plan – HDC Alpha, LLC

FCC Filer ID: 833332 **Service Type:** Interconnected VoIP Provider **Jurisdiction:** Colorado **USF Contributor:** No **Company Type:** Interconnected VoIP Service Provider (Non-Facilities-Based)

1. Executive Summary

HDC Alpha, LLC provides interconnected VoIP services enabling customers to originate and receive calls to and from the PSTN. As required under 47 CFR § 64.6305, HDC Alpha, LLC implements a comprehensive robocall mitigation program designed to prevent the origination of illegal robocalls on its network, verify the identity of customers, monitor traffic for suspicious patterns, and cooperate fully with traceback requests and FCC/industry enforcement actions.

HDC Alpha, LLC does not obtain numbering resources directly and does not operate its own facilities-based switching network. All PSTN interconnection occurs through upstream carriers. Nevertheless, HDC Alpha, LLC maintains full responsibility for ensuring that traffic originated by its customers complies with federal robocall rules.

2. STIR/SHAKEN Implementation Status

HDC Alpha, LLC does not operate its own IP multimedia subsystem (IMS) or SIP interconnection with the PSTN. Therefore, STIR/SHAKEN authentication is performed by its upstream carrier partners. HDC Alpha, LLC:

- Transmits accurate caller ID information to its upstream carrier(s).
- Ensures that all authenticated traffic is passed with correct attestation levels.
- Monitors upstream carrier compliance with STIR/SHAKEN obligations.

Because HDC Alpha, LLC is a non-facilities-based VoIP provider, its STIR/SHAKEN obligations fall under § 64.6305(b) and the Sixth Caller ID Authentication Order (2024). Consequently, we will become STIR/SHAKEN Compliant in the First Quarter 2027.

3. Robocall Mitigation Program Overview

HDC Alpha, LLC maintains a multi-layered mitigation program consisting of:

3.1 Know-Your-Customer (KYC) Identity Verification

Before activating any customer:

- Government-issued identification or business registration is verified.
- EIN, state business registration, and responsible officer information are validated.
- Customers must provide a valid use case for call origination.
- High-risk categories (e.g., lead generators, outbound call centers) undergo enhanced review.
- Customers with unverifiable identities are rejected.

3.2 Know-Your-Traffic (KYT) Monitoring

HDC Alpha, LLC continuously monitors traffic for:

- High-volume short-duration calling
- Repetitive sequential dialing
- Invalid or unassigned caller ID usage
- Calls to numbers on Do-Not-Call or known-fraud lists
- Sudden spikes in call attempts inconsistent with customer profiles

Suspicious traffic triggers immediate investigation, temporary suspension, or termination.

3.3 Call Authentication and Caller ID Integrity

HDC Alpha, LLC requires:

- Valid caller ID on all calls
- No spoofing of numbers without verified authorization
- No use of NANP numbers not assigned to the customer
- Upstream carriers to apply correct STIR/SHAKEN attestation

Customers must sign an agreement prohibiting illegal spoofing.

3.4 Prohibited Traffic Enforcement

HDC Alpha, LLC prohibits:

- Illegal prerecorded calls
- Telemarketing without consent
- Impersonation of government agencies, banks, or utilities
- Any traffic violating the TCPA, TSR, or state robocall laws

Violations result in immediate suspension and reporting to appropriate authorities.

4. Traceback Cooperation

HDC Alpha, LLC fully cooperates with the Industry Traceback Group (ITG) and responds to traceback requests within 24 hours. The company:

- Provides call records, customer identity, and routing information upon request
- Terminates customers found to originate illegal robocalls
- Implements corrective actions to prevent recurrence

HDC Alpha, LLC has never refused an ITG traceback request.

5. Ongoing Monitoring, Auditing, and Enforcement

HDC Alpha, LLC maintains:

- Continuous automated traffic analysis
- Manual review of flagged call patterns
- Quarterly audits of customer compliance
- Annual review of mitigation procedures
- Mandatory customer reverification for high-risk accounts

If illegal robocalling is detected:

1. Traffic is immediately blocked or rate-limited.
2. The customer account is suspended pending investigation.
3. Violations are reported to the ITG, FCC, FTC, and upstream carriers.
4. The customer is permanently terminated if wrongdoing is confirmed.

6. Employee Training and Compliance Governance

All employees involved in provisioning, customer onboarding, and network operations receive training on:

- FCC robocall rules
- STIR/SHAKEN requirements
- KYC/KYT procedures
- Traceback response protocols
- Illegal robocall identification

Compliance oversight is managed by the company's designated Robocall Compliance Officer.

7. Certification

HDC Alpha, LLC certifies that:

- It has implemented the robocall mitigation program described above.
- It takes reasonable steps to prevent the origination of illegal robocalls.
- It will update this plan as required by FCC rule changes.
- It will cooperate fully with traceback and enforcement actions.

8. Contact Information

Robocall Compliance Officer HDC Alpha, LLC

Bryan Petersen
Chief Network Officer
regulatory@carrierx.com
(562) 437-1411