



Inventive Labs Corporation

Robocall Mitigation Plan

Version 1.3

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Introduction

Inventive Labs is actively engaged and committed to preventing illegal robocalls from originating within our network. We have completed implementing Stir/Shaken within our networks. We also have implemented a Robocall Mitigation Plan to vet and educate our subscribers, detect and investigate suspicious activity, and mitigate such activity. We commit to respond to traceback requests and to cooperate with investigating and stopping illegal robocallers. All voice traffic originating on our network is subject to our robocall mitigation program.

Preventing Illegal Robocalls Begins with the Subscriber

Subscriber Vetting. We have procedures in place to vet the identity of new subscribers. We require an application for service for vetting purposes. Upon approval, the applicant is required to sign our contract to be able to gain access to number provisioning and network connectivity. We initially reject any potential subscriber whose information cannot be validated and work with the subscriber to correct any deficiencies in their application.

Acceptable Use Policy. All new subscribers are contractually obligated to abide by our Acceptable Use Policy (AUP) before being permitted to access to services. Current subscribers must also accept the AUP upon renewal of their existing contracts. This AUP contains language that prohibits the violation of any applicable local, state, or federal law, prohibits the subscriber from providing false information about origination identity, and contractually allows Inventive Labs to suspend service to any subscriber who engages in fraudulent activities and terminate such service for violation of the AUP.

“Know Your Customer” Initiative. Once a subscriber is vetted and has contracted for services, they may provision new numbers, port existing numbers, and originate and terminate calls. We communicate to new and existing subscribers our expectations for compliance with our robocall mitigation program and the consequences for unlawful activity. We help our subscribers become familiar with and understand these requirements. We also make them aware of any new laws or directives as they become effective. Moreover, we work with our subscribers to improve any deficient behavior and will suspend their activities if their call patterns are unacceptable. If any subscriber feels their calls were blocked erroneously, we will work with them to verify their claims, identify any concerns and determine the proper course of action.

Call Monitoring and Robocall Mitigation

Call Monitoring Technology. Our system determines the end user or subscriber’s right to use a telephone number. Not only do we endeavor to prevent illegal robocalls from originating in our network, we monitor calls that come into our network. Our intent is to identify behaviors that are consistent with illegal robocalling.

Telephone Number Validation. Our technology detects and blocks numbers that the FCC has defined as unlawful, such as unallocated numbers or numbers containing invalid numbers, digits or alpha-numerics.

International Call Originators. Our international subscribers may only originate calls with a number provisioned or ported on our systems. International customers are not permitted to use a caller id that they do not own.

Blocking Suspicious Activity. Our system monitors subscriber traffic patterns to detect suspicious activity. Any activity consistent with illegal robocalling will be blocked. We will also block calls that traverse our network that are confirmed to be robocalls. Subscribers will be notified of any adverse action taken to block their calls within 24 hours.

Calls That Will Not Be Blocked. We will not block 911 calls and will endeavor to ensure that calls to or from PSAPs and government emergency numbers are not blocked.

Responding to Tracebacks and Complaints

Robocall Mitigation Support Team. We have an internal support team that handles all complaints and traceback requests. A corporate officer is specifically responsible for managing this support team and receives timely information of all complaints and traceback requests.

Responding to Traceback Requests. We commit to respond to and cooperate with all lawful traceback requests. We will assist in investigating and stopping illegal robocalls originating from our network.

Responding to Robocall Complaints. Reporting unwanted calls can be submitted on our website or by phone to our Complaint Support Team. We will resolve complaints as quickly and as reasonably possible and will provide a status updates at least every 24 hours until resolved. Complaints filed in good faith are not charged for investigation.

Subscriber Concerns. If any of our subscribers feel their calls were blocked erroneously, we will work with them to identify concerns and determine solutions.

“Know Your Upstream Provider” Initiative

The FCC requires that VSPs take “reasonable and effective steps” to ensure that their immediate upstream providers are not processing high volumes of illegal traffic. We commit to follow this by monitoring information that is made available to us by the FCC and other sources and maintain the appropriate business and contact information for each provider.

FCC Compliance

Inventive Labs acknowledges that we are subject to FCC Stir/Shaken orders up to and including the Seventh Report and Order adopted May 18, 2023.

Plan Updates

Inventive Labs will promptly update this document as needed if we make any changes or improvements to our robocall mitigation program.