

NETRIO, LLC Robocall Mitigation Plan

February 15, 2024

Practices and steps taken to mitigate the origination, carrying, or processing of illegal robocalls.

1. STIR/SHAKEN Implementation

- a. All calls originating on NETRIO's network are signed with proper attestation, in full compliance, using the STIR/SHAKEN framework by NETRIO switching equipment.

2. Traceback commitment

- a. NETRIO commits to fully responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours and cooperating in investigating and stopping illegal robocallers.

3. Know-Your-Upstream Provider

- a. NETRIO sells directly to companies it knows and has a direct relationship with. The company's use of service is known to NETRIO.
- b. All customers have a signed Master Service Agreement with an Acceptable Use Policy prohibiting illegal or fraudulent calls.

4. New and Renewing Customers

- a. Customers are manually vetted at the time of initial contract and at contract renewal.

5. Analytics and Monitoring

- a. NETRIO monitors customer traffic to identify irregular changes in call volume, call duration, and activity.
- b. NETRIO also relies on our wholesale voice providers to identify and report any suspected illegal robocalls.
- c. Manual review of activities is conducted when any irregularities are found or reported.
- d. NETRIO does not use any third-party analytics vendor.

6. Actions Taken

- a. All traffic found to be in violation of NETRIO'S Acceptable Use Policy and/or to be illegal robocalls is blocked.
- b. NETRIO does not originate traffic from other voice service providers, non-gateway intermediate providers, or gateway providers. By extension, NETRIO does not originate traffic from any provider that is not listed in the Robocall Mitigation Database.