

Low Latency Communications LLC

Robocall Mitigation Plan – February 12, 2024

Key Facts / About Low Latency Communications LLC:

Low Latency Communications LLC is a voice service provider serving business end users. It provides no wholesale services to other voice service providers.

Low Latency Communications LLC is organized in and operated from the state of Alabama from its principal offices at 241 Applegate Trace, Pelham, AL 35124.

Low Latency Communications LLC is a single member LLC owned and managed per its parent holding company, IPiFony Systems, Inc.

Daryl Russo (President) and Matthew Hardeman (Vice-President and CTO) are the key principal executives responsible for the day to day operations and policies of Low Latency Communications LLC.

Low Latency Communications LLC is identified to the FCC by FRN 0024926677 and by 499 Filer ID 831-188.

Low Latency Communications LLC has been assigned OCN 709J by NECA.

Commitment to Timely Respond to Traceback Requests

Low Latency Communications LLC commits to respond timely (within 24 hours) and with all available records to all traceback requests received from the FCC, law enforcement agencies, and/or the Industry Traceback Group. Low Latency Communications LLC will cooperate with such entities in investigating and stopping illegal robocallers which might use its services to originate, carry, or process illegal robocalls.

Matthew Hardeman is the designated illegal robocalling and traceback person at Low Latency Communications LLC and can be reached at robocalling@lowlatencycomm.com and 205-443-0704.

Robocall Mitigation Principles

Low Latency Communications LLC subjects all calls originated on its networks to a robocall mitigation plan as set out below.

Low Latency Communications LLC has fully implemented STIR/SHAKEN on its IP networks.

Robocall Mitigation Plan – Specific Program Elements

Low Latency Communications LLC acquires, reviews, and maintains specific documentation related to customer identity in a “Know Your Customer” program.

- Customer entity type and entity name are identified and confirmed against commercial and/or government records as appropriate
- Key personnel are individually identified and their relationships with the customer entity are confirmed via commercial and/or government records as appropriate.
- The nature of business of the customer entity is assessed for appropriateness for our customer portfolio before onboarding. As one example, Low Latency Communications LLC will decline to serve outbound telemarketing use cases as a matter of policy.
- As a part of onboarding, all customer entities are subject to site visits for service installation, training, and related needs. The only exceptions are home offices / small remote sites which are branches or subsidiaries of customers whose sites we have visited either by own staff or by third party contractors.
- Customers are screened to ensure that they are the effective user of the services to which they are subscribed. Low Latency Communications LLC does not provide wholesale services to telecommunications service providers.

Low Latency Communications LLC applies appropriate caller ID screening on calls accepted for origination from its customers. This includes, unless special use case exceptions are mutually agreed and appropriate, restricting Caller ID presentations that are assigned to the customer by Low Latency or that Low Latency has otherwise identified as associated with the customer.

Low Latency Communications LLC applies an internally developed call analytic system to calls originating and/or terminating on our network. With respect to calls originating on our network, certain proprietary thresholds are monitored per-customer for number of calls initiated in 60 second, 5 minute, and 15 minute intervals. Exceeded thresholds result in reports to support staff who can investigate underlying call patterns and take appropriate actions including suspending services to the customer if any inappropriate calling is not halted immediately.

Low Latency Communications LLC reviews robocall mitigation filings for its upstream providers to ensure their compliance with reasonable steps for robocall mitigation to ensure that they do not introduce calls for termination to Low Latency customers into Low Latency’s network. These calls are also screened by Low Latency Communications LLC for improper/invalid originating Caller ID and blocked as appropriate.

Low Latency Communications LLC has an acceptable use policy adopted by reference by our commercial contractual agreements with customers. Our acceptable use policy makes clear that illegal robocalling traffic is not tolerated from customers and will result in suspension of services and/or permanent termination of services to a customer if not immediately remediated. More broadly, our acceptable use policy also forbids use of Low Latency services to facilitate outbound telemarketing campaigns.

Low Latency Communications LLC records and reviews call detail records to attempt to identify any patterns of abuse directed to customers or initiated by customers. Any concerning patterns identified are followed up by support staff who can engage with customers to remediate issues or discontinue service.