

NETWORK ENHANCED TELECOM, LLP – d/b/a NetworkIP
Robocall Mitigation Plan
Version 4.1 April 1, 2025

STIR/SHAKEN IMPLEMENTATION

Network Enhanced Telecom, LLP, doing business as NetworkIP (the “Company”), is a ***Non-gateway intermediate provider*** connecting customers to domestic and international destinations. This Robocall Mitigation Plan has been updated to address the latest FCC Report and Order and NPRM FCC-23-18. The Company has installed a STIR/SHAKEN solution provided by Sky Networks for IP-based calling, which was fully implemented prior to September 30, 2022. Our STI-CA provider is TransNexus. Our Operating Company Number (OCN) is 219H.

ROBOCALL MITIGATION

Background

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback: The Company will cooperate with and immediately respond to traceback requests received directly from carriers, industry associations, and law enforcement. Once a traceback request is received, call history records and a protocol analyzer platform are used to investigate the subject calls and obtain information to turn over to the requesting carrier. The Company uses customer profile information to aid in the analyzation of claims of suspected fraudulent calling. The Company reaches out to the customer for explanation if necessary.

Traceback Contact Information

Name	Title	Contact Information
NOC	Network Operations Center	Phone: 877-638-7762 (877-NETPROB) Email: noc@networkip.net
Kevin Lawrence	Network Engineer	Phone: 430-588-7394 Email: klawrence@networkip.net
Mike Truemner	Vice President – Network Operations	Phone: 903-323-4512 Email: mtruemner@networkip.net

2. Take Steps to Mitigate Illegal Traffic

The Company is able to assist with the mitigation of illegal activity when notified by the Commission through its enforcement bureau or when contacted directly by one of our carriers. If and when illegal activity is confirmed, the Company takes the appropriate actions to block/disable such illegal calls.

3. Measures to prevent origination of illegal calls

Know Your Upstream Carrier:

The Company only accepts calls from providers that are currently in the Robocall Mitigation Database (RMD) and that support STIR/SHAKEN. Their RMD documentation is reviewed periodically for compliance.

Know Your Customer:

The Company only sells to low-risk enterprises where Company representatives have met and visited with the customer. The Company confirms the Identity of new commercial VoIP customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.

Telephone Number Validation:

The Company asks the customer if they will be sending any origination numbers on outbound calls other than those TNs provided by the Company and, if so, how and why. We allow only legitimate spoofing of origination numbers, such as valid call forwarded numbers belonging to the customer or originating assigned DID numbers. All inbound traffic is validated by the Mobile or Landline end-office, eliminating the need for third-party analytics.

Network Analytics:

All inbound traffic is validated by the Mobile or Landline end-office, eliminating the need for third-party analytics. The Company constantly monitors its network for suspicious calling patterns which may trigger investigation, such as ...

- Caller-ID numbers that generate unusually-high call volumes
- Unusually-high volumes of short-duration calls
- High volumes of calls with non-standard or improperly-formatted Caller-IDs.
- Unplanned or non-forecasted calls in bursts.
- Sequentially incrementing Caller-ID or destination numbers.
- High call volumes at times inconsistent with historical trends for the originator's network.

Call Blocking:

When the Company's call analysis application identifies possible fraud, the Company works with its customers to confirm whether the traffic is fraudulent. Fraudulent traffic is blocked by call type or source. Our customers acknowledge and agree that they shall be responsible for timely identifying and resolving fraudulent usage related to its products and shall be responsible for any and all costs and expenses associated with same.

CONCLUSION

The Company submits this robocall mitigation plan, which is designed to comply with the Federal Communications Commission's Sixth Report and Order and NPRM (FCC 23-18). This plan is a work in progress and will be supplemented as the company gains more exposure to and experience with these processes.

CERIFICATION

This Robocall Mitigation Plan is attested by:

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