

Impulse Advanced Communications, LLC.

Robocall Mitigation Plan

February 2024

A Robocall is an unsolicited call from an auto-dialer that delivers a prerecorded voice message. Impulse Advanced Communications (IAC) OCN 250G will comply with efforts to control and investigate suspected robocalls.

- IAC will cooperate with traceback requests received directly from carriers, industry associations, and law enforcement.
- IAC's Vice President of Engineering is designated to investigate Robocall incidents.
- IAC's role in the call chain is as a Voice Service provider to end business customers in the US. IAC does not provide wholesale services to other voice service providers.
- IAC recognizes our obligation to implement STIR/SHAKEN on calls originating on our VoIP network and meets this obligation through facilities maintained by IAC for telephone numbers owned by IAC, and through contracted third-party providers for telephone numbers IAC resells from those third parties.
- IAC has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action.
- IAC has not been subject to a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to unlawful robocalling or spoofing and provide information concerning any such actions or investigations.

The following efforts prevent robocalls from originating on our network:

1. IAC "Knows our Customers"
 - a. IAC verifies that the corporate entity and business purpose is legitimate.
 - b. IAC verify telephone numbers are being legitimately used.
 - c. IAC does not provide service to the use case of outbound dialers
 - d. IAC verifies and updates Caller-ID, and CNAMs.
2. STIR/SHAKEN
 - a. IAC has completed the STIR/SHAKEN certificate process and has the ability to sign and verify calls on our network through telephone numbers owned by Impulse utilizing the vendor Sansay's technology.
 - b. The vendors we use to resell telephone numbers, Bandwidth.com and Commio have completed implementing STIR/SHAKEN in their network.
3. Traceback
 - a. We will actively participate in the traceback community including the FCC, law enforcement, and the industry traceback consortium.



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4. Robocall Mitigation Database

- a. IAC will maintain a record in the Robocall Mitigation Database
- b. IAC will block traffic received from a non-gateway intermediate provider that is not listed in the Robocall Mitigation Database, either because the provider did not file, or their certification was removed as part of an enforcement action. After receiving notice from the Federal Communications Commission that a provider has been removed from the Robocall Mitigation Database, IAC will cease accepting traffic from any identified provider that IAC originates or terminates traffic to within two business days.



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