



Evolve IP

ROBOCALL MITIGATION PLAN

Evolve IP, LLC (“EvolveIP” or “Company”) is a voice service provider (“VSP”) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. EvolveIP provides hosted voice over internet protocol (“VoIP”) services directly to end users as well as on a wholesale basis to hosted VoIP providers who serve their own end users.

Implementation of STIR/SHAKEN Framework

EvolveIP has fully implemented the STIR/SHAKEN authentication framework across its network and all calls it originates comply with 47 CFR § 64.6301(a)(1) and (2).

Know Your Customer Procedures

EvolveIP conducts reasonable due diligence on new and renewing customers to prevent them from using EvolveIP services to originate illegal voice traffic. EvolveIP thoroughly vets new business customers by asking general identifying questions for additional security on each account before activating new service or making changes to existing services. EvolveIP will perform a credit check through Credit Café.

EvolveIP addresses illegal use of any portion of EvolveIP services in our acceptable use policy (“AUP”). All customers agree to comply with the AUP as part of their onboarding and renewal process. If a customer is found in violation of the AUP, the customer’s service may be suspended or terminated after an investigation.

These measures require a customer to provide sufficient information to ensure its legitimacy and aid EvolveIP in “knowing its customers.” The measures also help EvolveIP inhibit its customers from using its services to originate illegal voice traffic.

Know Your Upstream Provider

As EvolveIP operates it owns VoIP platform, EvolveIP does not utilize an upstream provider. To the extent it will utilize upstream provider, the Company will confirm that its upstream provider is appropriately listed in the FCC’s RMD and has not been delisted pursuant to an enforcement action.



Use of Call Analytics to Identify and Block the Origination of Illegal Robocalls

EvolveIP uses third-party software provided by Transnexus and Equinox Protector to monitor traffic on its network and identify potentially unlawful call origination activity.

Cooperation with the Traceback Group, Law Enforcement, and Government Agencies

EvolveIP will respond to all traceback requests from the FCC, law enforcement, and the Industry Traceback Consortium (“ITG”) within 24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use EvolveIP’s network to carry or process calls. EvolveIP will take the steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the FCC through its Enforcement Bureau and will comply with the requirements of such notice and do so in accordance with the applicable FCC rules.

EvolveIP has further implemented a formal Traceback Policy which includes a clear mandate on how Traceback requests must be logged, to whom they must be expedited, and how appropriate call information can be retrieved and reported. Similarly, EvolveIP has implemented a formal Trace Forward Policy clearly outlining how a Trace Forward request can be formally logged, escalated, how appropriate details can be collected. A formal copy of both policies are available to internal employees at all times.

Formal Investigations

At no time in the prior two years has EvolveIP (or any entity with which it shares common ownership, management, directors or control) been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to EvolveIP transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Ownership and Management

EvolveIP, LLC is ultimately owned by Xtium, Inc.

The principals exercising management control of EvolveIP, LLC are:



Mike Pisteri, CEO

Jeanne Walters, CFO

Martin Call, COO

Walt Walker, CRO

Eric Stockton, CMO

Ron Zampolin, President Corporate Development

Katie Lukens, SVP People

The following entities are the parents, affiliates and subsidiaries of EvolveIP, LLC:

- Xtium Holdings, Inc.
- Xtium, Inc.
- Shoregroup Holdings, Inc
- Optanix Holdings, Inc
- Xtium EIP, Inc
- EIP Holdco, Inc (DE)
- EvolveIP Holdings, LLC
- EvolveIP Israel Ltd.
- MTEL B.V
- MTEL gmbH
- EvolveIP, LTD
- TVF Cloud, Inc
- ATSG India Private Limited
- XTUUM Holdings, LTD.
- dinCloud, Inc.
- dinCloud Holdings, LLC
- dinCloud, LLC
- dinCloud Pakistan (Private) Limited
- Xentaurs, LLC
- Vology Inc.

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