



Clearfly Communications
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Robocall Mitigation Plan

Know Your Customer

Clearfly sells through a partner network that vets its customers based on their business reputation and history. Our policies do not permit customers to use autodialers, and any abnormal calling volume would cause the customer and Clearfly to be alerted.

Traceback

Clearfly will respond to all traceback requests from the Industry Traceback Group, the FCC, and law enforcement, and we will cooperate with such entities in investigating suspected illegal robocalls, and will stop any calls determined to be illegal.

STIR/SHAKEN Implementation

Clearfly fully implements STIR/SHAKEN, and ensures that all calls are signed before being sent to upstream carriers.

Robocal Mitigation Program

Clearfly maintains its own billing system which continuously monitors imported billing records on a real-time basis for anomalous calling activity. Once identified, the customer and support staff are automatically notified so that the calling patterns can be investigated and mitigated if necessary. Failure to comply with mitigation recommendations can result in suspension or termination of a customer's services, per Clearfly's published Acceptable Use Policy (AUP).