

Illegal Robocall Mitigation Policy

Policy Statement. VOXOX fully supports the efforts by the various Federal, State, and local regulatory agencies to protect consumers and help rid the USA of the scourge of illegal robocalling and calls that violate TCPA rules by implementing the following policies and procedures summarized here and detailed below.

- **KYC.** Force strict and thorough Know Your Customer (KYC) protocols and practices to help prevent bad actors from becoming VOXOX customers and perpetuating their fraud on the VOXOX Network.
- **KYCT.** Traffic is not allowed to ramp-up from a new customer until we have analyzed such traffic to make sure it's following robocalling, telemarketing and TCPS rules & regulations.
- **Provisioning.** All new customers and existing customers participating in short duration robocalls will be set-up with separate trunk groups and monitored much more closely than conversational customers.
- **Stir/Shaken.** All calls that come to us unsigned will be filtered by VOXOX Filtering Systems, and either (1) signed and passed through our network, or (2) returned to the customer to route advance in their LCR, or (3) stopped the call(s) from being completed or route-advanced.
- **ITG Compliance.** VOXOX will fully cooperate with the Industry Traceback Group (ITG) promptly on all traceback requests to help identify bad actors.
- **TCPA & Telemarketing Sales Rule Compliance.** VOXOX will not willfully assist customers in violating the Telephone Consumer Protection Act (TCPA) and other laws designed to protect consumers from unwanted and/or illegal robocalls.
- **FILTERING.** VOXOX uses anti-robocall filtering system which check the calling party's phone number and called party's phone number for suspected fraud using several third-party databases. It will be configured on a customer-by-customer basis to increase filter sensitivity commensurate with KYC policy.
- **Monitoring.** Using filtering systems, calls are monitored to identify calling patterns consistent with fraud for follow-on action to eliminate it from our network without regard for potential revenue loss.
- **Repeat Offenders.** Customers who continue to be responsible for tracebacks and do not take corrective action to address fraudulent call patterns will be terminated using the Company's Three Strikes Rule.
- **Law Enforcement Notification.** Notification will be sent to the appropriate law enforcement authorities on Customers who are purposely sending illegal robocalls.

1. **Definitions:** For purposes of these policies, procedures and protocols, the following definitions shall apply.

- a. **"Aggregator"** shall mean a FCC licensed long distance telecom carrier with a 499 Filer ID and a RMD FRN number who sells USA termination on a wholesale basis to other such like long distance carrier.
- b. **"ANI"** means the originating phone number of a call.
- c. **"Conversational Traffic"** shall mean long distance traffic that averages 60-seconds or longer.
- d. **"Caller ID Spoofing"** means when a caller deliberately falsifies the phone number transmitted to the caller ID number shown on a person's phone display to disguise their identity, oftentimes to defraud consumers.
- e. **"DNC"** means the Do Not Call list consumers use to register their phone numbers to avoid sales and marketing related calls that are unwanted.
- f. **"DNIS"** means the called to party on a call.
- g. **"DNO List"** means calls originating from a list of known phone numbers that are for inbound calling only which are spoofed by bad actors to fool customers into believing they are getting calls from the company who owns such phone number.

- h. **“Enterprise Call / Contact Center”** means a foreign or USA based call or contact center that is not engaged in selling USA terminating minutes to carriers, resellers, or aggregators.
- i. **“FRN number”** means the registration number assigned to a carrier, reseller, or aggregator by the RMD.
- j. **“KYC”** shall Know Your Customer and the process for doing so to screen out bad actors before they send illegal traffic over our network.
- k. **“KYCT”** shall mean Know Your Customer’s Traffic and the process for doing so for the purpose of analyzing traffic for illegal calls before allowing full customer production traffic to commence on our network.
- l. **“Pre-production & Test Traffic”** means the initial customer traffic and limited small volume production traffic sent over the VOXOX Network for purposes of analyzing such traffic for potential fraud and violation of various laws.
- m. **“Production Traffic”** means Customer traffic being sent to the VOXOX Network that represents normal daily traffic volumes the Company can expect to receive.
- n. **“RMD”** shall mean the FCC’s Robocall Mitigation Database.
- o. **“Short Duration Traffic”** shall mean long distance traffic that averages less than 12-seconds in length.
- p. **“Filtering Systems”** means software systems that help to identify numerous types of suspicious and illegal calling activity by dipping up to 15 different and everchanging databases which identify calls with a high probability of fraud or outright fraud.
- q. **“Reseller”** means a licensed USA carrier, with a FCC 499 Filer ID and a RMD FRN number who offers USA termination to call or contact centers in the USA or abroad but who does not offer service to other carriers, resellers or aggregators.
- r. **“TCPA”** means the Telephone Consumer Protection Act which specifies rules for sending calls to US consumers which must be followed by callers and carriers allowing calls to traverse their networks.
- s. **“The VOXOX Network”** shall mean the Company’s switching platform and underlying carriers it uses to terminate traffic to the USA and internationally.
- t. **“TSR”** means the Telemarketing Sales Rule which specifies rules for sending calls to US consumers which must be followed by callers and carriers allowing calls to traverse their networks.

2. Traceback Investigation Compliance Policy:

- a. **Full Cooperation.** VOXOX will comply with all Traceback investigations initiated by the Industry Traceback Group (ITG) and will provide all information requested.
 - i. **Department Name:** Voice Operations
 - ii. **Contact Person Names:** Asim Dawal
 - b. **Dedicated Telephone & Email Addresses:** (619) 900-9060 for howingyal@voxox.com and their business hours to receive Traceback investigation requests.
3. **KYC Onboarding:** VOXOX is committed to protecting USA consumers by blocking suspected illegal robocalling by carefully vetting each new prospective customer to eliminate bad actors, upfront, before they have a chance to pass illegal robocalls and other illegal calls that would violate TCPA rules before allowing their traffic to traverse the VOXOX network. All prospective new customers first must fill out and sign VOXOX’s KYC form which will be vetted, verified, and approved prior to such potential customer being presented with a Company contract, provisioning form, and being allowed access to the VOXOX Network. The following table specifies the KYC requirements for onboarding new customers depending upon whether the customer is a USA or foreign based carrier

and whether its is a wholesale Reseller/Aggregator or Enterprise Call Contact Center. Customers not meeting these requirements will not be onboarded as a general rule unless approved in writing by VOXOX senior management.

VOXOX KNOW YOUR CUSTOMER POLICY CHECKLIST		USA BASED		FOREIGN BASED	
ITEM NO.	KYC REQUIREMENT by NEW CUSTOMER TYPE	WHOLESALE CUSTOMER	ENTERPRISE CALL CENTER	WHOLESALE CUSTOMER	ENTERPRISE CALL CENTER
1	Check if KYC form is complete and filled out correctly.	✓	✓	✓	✓
	Search Applicant name & owner on Google.				
2	Confirm Applicant website is functioning and links are active.	✓	✓	✓	✓
3	Confirm Applicant's website logo is not cloned by using 3 rd party website www.images.google.com	✓	✓	✓	✓
4	Confirms Applicant's website domain age using 3rs party software www.whois.com	✓	✓	✓	✓
5	Confirm Applicant's switch or auto-dialer IP Address using 3 rd party website for blacklist designation www.abuseipdb.com/check/207.246.84.98	✓	✓	✓	✓
6	Confirm Applicant's company address using 3 rd party service by Google Maps	✓	✓	✓	✓
7	Confirm and verify Applicant's FCC 499 Filer ID, Company name and contact information using 3 rd party website https://apps.fcc.gov/cgb/form499/499a.cfm	✓	N/A	✓	N/A
8	For US Applicants o to the Secretary of State website Date of customer's company formation. Companies less than 6-months old rejected.	✓	✓	N/A	N/A
9	Verify USA Applicant's Federal Tax ID using 3 rd party website www.tinverify.com	✓	✓	N/A	N/A
10	Verify foreign Applicant's information by using 3 rd party website www.trulioo.com	N/A	N/A	✓	✓
11	Verify Applicant's Robocall Mitigation Database registration using 3 rd party website for existence and completeness https://fccprod.servicenowservices.com/rmd?id=rmd_listings	✓	N/A	✓	N/A
12	Verify Applicant's FCC Registration Number using 3 rd party website https://fccprod.servicenowservices.com/rmd?id=rmd_listings	✓	N/A	✓	N/A
13	Verify Applicant's Stir/Shaken implementation by using 3 rd party website https://fccprod.servicenowservices.com/rmd?id=rmd_listings	✓	N/A	✓	N/A
14	Search Applicant's contact name in Google with keyword as "FCC" or "FTC" to find any complaints, investigations, or lawsuits and disposition thereof.	✓	✓	✓	✓
15	Search Applicant's company name in Google with keyword as "FCC" or "FTC" to find any complaints, investigations, or lawsuits and disposition thereof.	✓	✓	✓	✓
16	Check Applicant's ANIs to be used for calling using 3 rd party website www.youmail.com	N/A	✓	N/A	✓
17	Check Applicant's CDRs for spoofed ANIs to be used for calling using 3 rd party website www.youmail.com	N/A	✓	N/A	✓
18	Check Applicant's provided carrier references to verify Applicant company and contact names and traceback history	✓	✓	✓	✓
19	Determine Applicant's IP address Geo Location using 3 rd party website www.ipinfo.io for use of foreign IP address.	N/A	✓	N/A	✓

4. **Know Your Customer's Traffic (KYCT) for New Customers.** For all new customers, and as part of the Company's KYC Policy, and as an added method for vetting customers, upfront, before full production traffic is processed over the VOXOX Network, the Company's Traffic Analysis team will monitor customer test and pre-production traffic for suspicious calling patterns consistent with illegal robocalling and also for calls that are in violation of Federal and State laws for telemarketing and for consumer protection. Customers whose traffic is shown to be in violation of such laws, will be prohibited from sending production traffic, and may be prohibited from sending further test and/or pre-production traffic before such new customer is allowed to send full production traffic

5. **New Customer Set-Up Policies.** To mitigate the potential for illegal traffic entering the VOXOX network by new customers who have somehow been able to get past our KYC scrutiny, the following steps will be taken as part of our KYCT protocols.

- a. **Traffic Separation.** Separate trunk groups will be set-up for each customer according to each of the twelve traffic types below. This is due the fraud monitoring protocols required for each type.

Traffic Origination	Traffic Types	
	Traffic Type	Product
USA	Wholesale Reseller	Short Duration
		Conversational
	Wholesale Aggregator	Short Duration
		Conversational
	Enterprise / Call Center	Short Duration
		Conversational
Foreign	Wholesale Reseller	Short Duration
		Conversational
	Wholesale Aggregator	Short Duration
		Conversational
	Enterprise / Call Center	Short Duration
		Conversational

- b. **Limited Capacity.** Port Capacity shall be limited initially until VOXOX has been able to analyze new customer's traffic to make sure it follows robocall mitigation and TPCA rules depending upon the customer type and associated risk.

Traffic Types		USA Originating	Foreign Originating
Traffic Type	Product		
Wholesale Reseller	Short Duration	500	100
	Conversational	1,000	200
Wholesale Aggregator	Short Duration	500	100
	Conversational	1,000	200
Enterprise / Call Center	Short Duration	500	100
	Conversational	1,000	200

- c. **Filters.** All filters will be set to the highest levels, initially, despite potential revenue loss, until our KYCT protocols prove they can be relaxed. Foreign originating traffic is give the highest level of scrutiny to help stop illegal robocalls from entering the USA especially given the current environment where foreign carriers are, ironically, not required to be Stir/Shaken compliant by the FCC until June of 2023.

NEW CUSTOMER FILTER SETTINGS		USA ORIGINATING IPs			FOREIGN ORIGINATING IPs		
ITEM NO.	ANI FILTER SETTINGS BY CUSTOMER TYPE	WHOLESALE CUSTOMER		ENTERPRISE CALL CENTER	WHOLESALE CUSTOMER		ENTERPRISE CALL CENTER
		SHORT DURATION	CONVER-SATIONAL		SHORT DURATION	CONVER-SATIONAL	
1	Spam/Unwanted Threshold	****	****	****	****	****	****
2	TCPA Violation Certainty	✓	✓	✓	✓	✓	✓
3	Fraud Certainty	✓	✓	✓	✓	✓	✓
4	Neighbor Spoofing: Thousand Block	****	****	****	****	****	****
5	Neighbor Spoofing: NPA-NXX Prefix	****	****	****	****	****	****
6	Neighbor Spoof:OCN/LATA/Rate Ctr	****	****	****	****	****	****
7	Neighbor Spoofing: Thousand Block	****	****	****	****	****	****
8	Local Do Not Originate	✓	✓	✓	✓	✓	✓
9	Toll-Free Do Not Originate	✓	✓	✓	✓	✓	✓
10	Wireless	****	****	✓	****	****	✓
11	Does Not Originate (P-C)	****	****	****	****	****	****
12	Toll-Free Do Not Originate	****	****	****	****	****	****
Note: ****Will be used for suspected abuse or related to Tracebacks as needed.							
ITEM NO.	DNIS FILTER SETTINGS BY CUSTOMER TYPE	WHOLESALE CUSTOMER		ENTERPRISE CALL CENTER	WHOLESALE CUSTOMER		ENTERPRISE CALL CENTER
		SHORT DURATION	CONVER-SATIONAL		SHORT DURATION	CONVER-SATIONAL	
1	Wireless	N/A	N/A	****	N/A	N/A	****
2	Do Not Call (DNC)	✓	✓	✓	✓	✓	✓
3	404 Filter	✓	✓	✓	✓	✓	✓
Note: DNC filter can be turned off for Call Centers showing proof of opt-in or evidence of an existing business relationship.							

6. **New Customer Stir/Shaken Configuration** - New trunk groups are required to have the following settings depending upon Customer Type and whether Customer is based in the USA or internationally. This is required due to the different levels of monitoring attention and call filtering levels to help mitigate illegal robocalling traffic on the VOXOX Network and to attest for such calls to help the industry identify bad actors.

NEW CUSTOMER CONFIGURATION RULES		USA ORIGINATING IPs			FOREIGN ORIGINATING IPs		
ITEM NO.	STIR/SHAKEN REQUIREMENT BY NEW CUSTOMER TYPE & DID PROVIDER	WHOLESALE CUSTOMER		ENTERPRISE CALL CENTER	WHOLESALE CUSTOMER		ENTERPRISE CALL CENTER
		SHORT DURATION	CONVER-SATIONAL		SHORT DURATION	CONVER-SATIONAL	
1	Separate Trunk Groups for Short Duration Traffic, Conversational Traffic and also for Reseller and Aggregator Traffic.	✓	✓	Designated as SD	✓	✓	Designated as SD
2	Stir/Shaken Attestation Level for VOXOX provided DIDs:	*A Level Attestation	*A Level Attestation	A Level Attestation	**A Level Attestation	**A Level Attestation	A Level
3	Stir/Shaken Attestation Level for 3rd party DIDs for calls that came in <u>unsigned</u> :	C Level Attestation	C Level Attestation	***B Level Attestation	C Level Attestation	C Level Attestation	***B Level Attestation
4	Stir/Shaken Attestation Level for 3rd party DIDs for calls that came as <u>signed</u> :	Calls not signed by VOXOX	Calls not signed by VOXOX	Calls not signed by VOXOX	Calls not signed by VOXOX	Calls not signed by VOXOX	Calls not signed by VOXOX
Note: * Requires calls to be signed by Reseller, otherwise customer does not qualify for VOXOX provided DIDs. ** For Resellers selling directly to call centers only--not Aggregators--otherwise VOXOX DIDs cannot be provided. *** Customers providing Proof of Ownership or Letter of Authorization from 3rd party DID provider will allow A-level attestation.							

7. Traceback Reactive Compliance Policy & Procedures.

- a. **Prompt Response to ITG.** VOXOX's Traceback Group shall strive to complete its investigation within 4-hours of receipt of such Traceback request and return the results within 24-hours back to the ITG.
- b. **Follow-on Actions:**
 - i. Traceback will be forward to the VOXOX account manager for follow-up with the Customer.
 - ii. VOXOX account manager will take action as defined below to mitigate the traffic source.
 - iii. Response communications between VOXOX & Customer will be documented Zendesk
- c. **Existing Accounts** that are more than three months old are limited to a "Three Strikes" Traceback policy.

EXISTING ACCOUNT POLICY & PROCEDURES ON TRACEBACKS			
STRIKE	TIME PERIOD	SUSPENSION	CUSTOMER REMEDY(S)
1	Within 3-months of start date	Immediate and for 7-days after customer remedy compliance	Customer must agree to specific disclosure of information and corrective action
2	Within 30-days of 1st traceback	Immediate and for 15-days after customer remedy compliance	Customer must sign VOXOX Compliance Statement of Corrective Action & pay \$250 fine
3	Within 30-days of 2nd traceback	Permanent	None available

- d. **New Accounts** that are less than 3-months old are limited to a "Three Strikes & You're Out" Traceback & TCPA Violation policy as follows:

NEW ACCOUNT POLICY & PROCEDURES ON TRACEBACKS			
STRIKE	TIME PERIOD	SUSPENSION	CUSTOMER REMEDY(S)
1	Within 30-days of start date	Immediate and for 15-days after customer remedy compliance	Customer must agree to specific disclosure of information and corrective action & pay \$250 fine
2	Within 30-days of 1st traceback	Immediate and for 30-days after customer remedy compliance	Customer must sign VOXOX Compliance Statement of Corrective Action & pay \$250 fine
3	Within 30-days of 2nd traceback	Permanent	None available

8. Existing Customer Traceback Compliance Corrective Action Policy:

- a. Customer agrees to provide a screenshot of Traceback Group's notice showing offending underlying customer name. If such underlying customer is also a direct customer of VOXOX, same Three Strike Policy & Procedures are invoked.
- b. Customer agrees, in writing, to remove offending underlying customer's traffic from being routed to VOXOX.
- c. Customer may be required to groom its traffic to further mitigate the potential for tracebacks.
- d. Customer shall pay fines as set forth above per incidence of Traceback.
- e. For second offense customers, they will be required to sign a Compliance Statement of Corrective Action.

9. Proactive Illegal Robocall Mitigation Policy & Procedures:

- a. Account traffic is subject to ongoing regular random inspection. Calls found with fraud or calls in violation of TCPA & Telemarketing Sale Rules laws are reported to Customer for correction or possible suspension for non-compliance
- b. First communication to customers for non-compliant calls will ask for corrections and verification of such correction has been fulfilled.

- c. Subsequent calls are subject to a \$250 fine and potential service interruption in the event of frequent offenses and/or perception by VOXOX that customers intentions are not genuine.
- d. Customers found to have a recent traceback reported by another carrier besides VOXOX are put into Company's Three Strikes Policy & Procedures.
- e. Email blasts will be sent to customers periodically as needed to keep customers up-to-date on current or changing TCPA & Illegal Robocall Mitigation rules and best practices.

10. Proactive Telemarketing Sales Rule & TCPA Compliance Protocols. Customer traffic is subject to filtering and analysis by VOXOX's Filtering Systems for the following illegal or suspicious activities

- a. Spoofed ANI's originating from VOXOX mobile identified as that meeting the following criterion:
 - ii. Short duration calls using automated dialing machines who a mobile phone ANI.
- b. Short Duration calls being sent to customers on the national know Do Not Call list.
- c. Customer traffic is filtered to identify and potentially block calls from ANIs with bad reputations with high probability of being fraudulent.

11. DID Ordering Qualifications: Given that tracking of a DID's/ANI's reputation is a key part of identifying illegal robocalling and bad actors, and given's VOXOX's desire to not circumvent such monitoring systems by allowing customers to acquire a fresh DID that will take time to establish a bad reputation, DIDs will only be issued to vetted enterprise call center customers and resellers—not to aggregators for use in robocalling. VOXOX will not offer such DID services to its wholesale carrier customer who are aggregators who do not know their underlying customers directly. VOXOX will sign for such authorized customer with the highest attestation level A.

12. Reporting to Authorities: Customers, who have shown to be knowingly ignoring or violating Federal and State laws will be reported to the necessary Federal, State, or local government agency responsible for enforcement of such laws.