



Robocall Mitigation Plan

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

The Provider has implemented the STIR/SHAKEN authentication framework on a portion of its network and calls it originates on that portion of its network are compliant with 47 CFR § 64.6301(a)(1) and (2). In addition, the Provider has established the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Provider's service to originate illegal robocalls.

Presently, the Provider relies on the continuing extension from STIR-SHAKEN implementation provided under 47 CFR § 64.6304 (d) which exempts from STIR-SHAKEN Caller ID Authentication those portions of a voice service provider network that rely on technology which is unable to initiate, maintain, carry, process, and terminate interconnected VoIP calls. More specifically, calls originating from the company's switch are not capable of initiating, maintaining, carrying, processing, or terminating interconnected VoIP calls, with a continued transmission of STIR-SHAKEN attestation data.

Robocall Mitigation Program

Our system has settings in place to allow a limited amount of calls per customer at once. Through our Metaswitch soft switch, we only allow a customer to originate calls from a number that identifies in our switch as a number that has been assigned to that customer. This prevents a from originating calls with a spoofed caller ID number. When our soft switch determines that a customer is attempting to originate a call from a number not assigned to them, the switch will not allow the call to go through. This is a decisive and effective measure that will prevent the origination of illegally spoofed robocalls.

If we receive a complaint about a customer originating excessive calls, we will contact that customer to determine whether any suspected illegal robocalling is taking place. We will then take mitigating steps as necessary.

Any special requirements for customers whose high originating call volume was lawful will be determined on a case-by-case basis and documented. If necessary, special contracts will be established clarifying the proper uses of call origination services, and service will be terminated for abuses.

If it is determined a customer's excessive originating call volume is a result of illegal robocalling, we will immediately notify and inform that customer and take appropriate action. This could include implementing mandatory account codes for out dialing; barring calls to local numbers, national numbers, international numbers, or any combination of the three; blocking outgoing calls, incoming calls, or both; and/or severing relationship with that customer if no other action solves the problem.