

SpliceTel Inc

Robocall Mitigation Plan

1. SpliceTel Inc is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that it learns are using our service to originate calls or transit calls into the United States and territories.
2. Splicetel Inc has fully implemented STIR/SHAKEN
3. SpliceTel Inc commits to respond to all trace back requests from the Commission, law enforcement and the industry traceback consortium. SpliceTel Inc will cooperate in a timely manner with such entities to investigate and stop any illegal robocalls that use our network to originate calls. If one of SpliceTel Inc's customers determines that their number has been spoofed and reports it to our staff, SpliceTel Inc will initiate a traceback request with the industry traceback consortium.
4. SpliceTel Inc has taken the following steps to detect and avoid originating illegal robocalling traffic on our network as part of our Robocall Mitigation Program.
 - a. SpliceTel Inc has contracted with an upstream provider to utilize their STIR/SHAKEN product for all originating traffic that is delivered to the their tandem.
 - b. All SpliceTel Inc outbound traffic is a subject to CPS restrictions and is monitored daily via internal analytics for unusual increases in voice network traffic which will be investigated to identify the customer generating the traffic. The customer will be contacted to determine the cause of the high volume traffic. If it is determined to be illegal robocalling traffic, steps will be taken to block the illegal robocalls.
 - c. If a new or existing customer orders more than five service lines, they will be contacted to determine the intended use of the service. If it is determined that the services will be used for illegal robocalls, we will refuse to initiate the services. If it is determined that the lines are needed for legitimate calls, we will install the additional service lines and put them on a "watch list" in case their business model changes.
 - d. In order to prevent TN spoofing and make sure all outbound calls coming from out network have legitimate Caller IDs, all customers have their CLID(num) hard-coded.
5. Splicetel inc reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.