

NEWMAX, LLC dba INTERMAX NETWORKS' ROBOCALL MITIGATION POLICY

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I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. In the Commission's recent Report and Order, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (March 17, 2023) ("R&O") it stated that all voice service providers, even those that are fully STIR/SHAKEN compliant, must file robocall mitigation plans that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- Details the reasonable steps taken to avoid originating illegal robocalls;
- Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls and describes any call analytic system used to identify and block illegal traffic;
- Adopts "know your customer procedures";
- Details whether a third-party vendor is used and if so, the name of the vendor; and
- Is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Newmax, LLC dba Intermax Networks, an Idaho limited liability company (hereinafter "Intermax").

II. General Prohibition Against Illegal Robocalling

Intermax's customers are subject to restrictions contained in its notices and all executed services orders, including the requirement that service is provided pursuant to its Acceptable Use Policy requirements.

Its existing Acceptable Use Policy prohibits activities normally associated with Robocalling including, but not limited to:

- Undertake or accomplish any unlawful purpose. This includes but is not limited to, posting, storing, transmitting, or disseminating information, data or material which is libelous, obscene, unlawful, threatening, or defamatory, or which infringes the intellectual property

rights of any person or entity, or which in any way constitutes or encourages conduct that would constitute a criminal offense, or otherwise violate any local, state, federal, or non-U.S. law, order, or regulation;

- Post, store, send, transmit, or disseminate any information or material which a reasonable person could deem to be unlawful;
- Using the Service to upload, post, publish, transmit, reproduce, create derivative works of, or distribute in any way information, software, or other material that is protected by copyright or other proprietary right, without obtaining required permission of the owner;
- Transmit unsolicited bulk or commercial messages commonly known as Spam;
- Send very large numbers of copies of the same or substantially similar messages, empty messages, or messages which contain no substantive content, or send very large messages or files that disrupts a server, account, blog, newsgroup, chat, or similar service;
- Initiate, perpetuate, or in any way participate in any pyramid or other illegal scheme.

Intermax's contractual terms with customers specify that Intermax may take action, including termination of service, for violating the Acceptable Use Policy. Intermax publishes the Acceptable Use Policy on its website and notifies existing customers of any updates.

III. Efforts to Avoid Illegal Robocalls

Intermax has made meaningful efforts to combat illegal robocalls as part of its robocall mitigation program. As part of its robocall mitigation program, Intermax provides the following solutions on its network to help minimize the impact of illegal or unwanted robocalls on customers:

Analytics for Call Monitoring

Automatic Number Identification ("ANI") Management: Utilized for customer traffic which is sent to Intermax from Inteliquent. ANI management is used to identify and block originating telephone numbers that are deemed abusive based on repeat attempts to reach the Intermax network.

Additionally, Intermax works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Intermax detects a calling pattern consistent with illegal robocalls, we will identify the party and take appropriate action. Appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our system.

Proactive Blocking

Proactive Blocking: Applied to all traffic. Per the rules adopted by the Commission in FCC Order 17-151, Intermax blocks calls from phone numbers on Do-Not-Originate ("DNO") lists from Inteliquent. In situations where Intermax suspects it has identified unlawful calling, it may also contact Inteliquent or another call provider, if applicable, and request it investigate its calls.

Authorization for Outbound International Calls

Intermax requires authorization before any outbound international calls are placed to ensure the person placing the call has the authority to do so and that the call is legitimate.

IV. Know Your Customer

Intermax maintains close contact to every customer utilizing its voice services. Intermax holds in-person meetings with each customer who signs a contract for voice services thereby allowing Intermax to be able to assess and validate that each customer is intending to use the voice system in an appropriate manner. All customers must provide: name, address, email address, point of contact, and contact phone number. All customer information is verified on their service orders to confirm accuracy. Further, all customer contracts provide that Intermax may terminate service if its services are abused by new or existing customers.

V. Know Your Upstream Provider

Intermax receives voice traffic from the following upstream provider:

Inteliquent, Inc. DBA Onvoy, Sinch ("Inteliquent")
550 W. Adams St.
Suite 900
Chicago, IL 60661
Contact: Frank DiGrazia Frank.DiGrazia@sinch.com

VI. Commitment to Responding to Traceback Requests

Intermax will respond to, within 24 hours, and actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls.

Certification of Caitlin Kling

I, Caitlin Kling, General Counsel of Newmax, LLC dba Intermax Networks ("Intermax"), do hereby certify, under penalty of perjury, the following:

(1) Intermax has fully implemented STIR/SHAKEN in the IP portions of its network.

(2) Intermax's business name and primary address are as follows:

Newmax, LLC dba Intermax Networks
7400 N. Mineral Drive, Ste. 300
Coeur d'Alene, ID 83815

(3) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.

(4) Intermax's role in the call chain is that of a voice service provider and Gateway Provider with a STIR/SHAKEN implementation obligation serving end users.

(5) Intermax has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

(6) Intermax is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

(7) Intermax's Operator Code Number is 767J.

Caitlin K. Kling

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