

Plivo Robocall Mitigation Plan

Plivo is dedicated to combating illegal robocalls and fraudulent traffic. We implement stringent measures to avoid originating, carrying, and processing such illegal traffic. Additionally, we take proactive and effective steps to prevent both new and existing customers from using our network for illegal calls, as detailed below.

Mitigation Practices

STIR/SHAKEN Implementation

Plivo has fully implemented the STIR/SHAKEN authentication framework on its network. Plivo signs its own calls based on customer and caller ID verification to ensure authenticity and prevent spoofing.

Verified Caller ID

Plivo has introduced the Verified Caller ID feature, which requires customers to verify their caller IDs on the Plivo platform before use. Customers must input the numbers they intend to use as caller IDs. Plivo will initiate an OTP verification via SMS or voice. The caller ID can only be used once it has been successfully verified.

This process aims to eliminate bad actors who might spoof caller IDs to place illegal calls.

Analytics and Monitoring

Plivo employs sophisticated monitoring to identify bad actors using suspicious keywords in applications to impersonate financial or other institutions and collect sensitive information from end-users.

Our data-driven monitoring system identifies abnormal surges in call volumes that may indicate suspicious traffic. We also monitor traffic stats, such as zero-duration and short-duration calls, to detect deviations. Alerts are sent to customers in case of abnormal traffic surges, enabling them to review and block unintended traffic promptly.

Premium Numbers Control

By default, Plivo customers cannot place calls to premium prefixes. Plivo regularly update the list of premium numbers and ensure necessary steps are taken to prevent calls towards Premium numbers.

Acceptable Usage Policy

Plivo enforces a stringent Acceptable Usage Policy (AUP) that all customers must adhere to in order to operate on Plivo platform as part of contractual obligations. Plivo reserves the right to suspend or terminate services for any customer generating illegal robocalls and other illegal or fraudulent activities, including violating applicable laws.

Plivo's fraud analysis and governance team proactively monitors and identifies bad actors. Identified customers are immediately suspended, and a suspension notice is sent via email.

Monitoring FCC Enforcement Actions

Plivo monitors the FCC's releases and enforcement actions against companies involved in illegal robocalls. We take appropriate actions to ensure such companies do not use Plivo's services and prevent their sign-up.

KYC (Know Your Customer)

Plivo has implemented measures to collect customer information, including the nature of their business, use case, and sign-up origin, for further analysis. Plivo has developed an advanced in-house algorithm that detects and blocks potential fraudulent customers during the sign-up process. These users are granted access to Plivo services only after they provide details about their use case. Our fraud analysts review this information, and if all checks are passed, access is granted.

Know Your Upstream Provider

In the event where Plivo provides services to an upstream provider, Plivo takes necessary and reasonable steps to ensure that such upstream providers are not using Plivo's services to carry or process illegal robocalls. These steps include verifying the

identity and legitimacy of all upstream providers, monitoring their traffic to detect unauthorized access, unusual traffic patterns, fraudulent activities, deliberate or artificial inflation of traffic, volume manipulation, toll fraud, and account takeovers. Additionally, Plivo contractually obligates its upstream providers through agreements, Terms of Use, and Acceptable Use Policy to comply with all relevant laws, including specific provisions prohibiting the transmission of fraudulent traffic and robocalls. Furthermore, Plivo segregates voice traffic that does not comply with these requirements to ensure that non-compliant traffic is not carried or processed.

Traceback Commitment

Plivo is committed to fully responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours. We cooperate with these entities to investigate and stop any illegal robocallers using our services to / originate, carry, or process calls.