



US IP Communications - Robocall Mitigation Plan

Background

US IP Communications is an Internet Services and Application OTT provider. We provide Wholesale Internet along with SMS/MMS, VoIP, VoIP Conferencing, and Video Conferencing. We currently have under 100,000 clients utilizing our platform and services. We currently own our own platform for VoIP/Video and SMS/MMS. We rely on upstream providers for inbound numbers for SMS/MMS and VoIP/Video. We service Business class customers only. Our Terms and Conditions state: No robocalling is allowed through our system and is terms for disconnection under Section 1.1.a.viii

Robocall Mitigation

Currently, the following methods are used to prevent abuse of our T's and C's while also mitigating robocalls.

- Every Customer is limited on the amount of concurrent calls that can occur from their Account by contract and by the system. The Account settings are controlled by our Engineering and Support group to prevent any customer from violating these constraints
- Every User is limited under each Account by Engineering and Support. No user can exceed the total Account limit for placing outbound calls.
- Every Endpoint under each User for each Account is limited from making calls that may exceed the limits on the Account. Typical Endpoint limit for concurrent calls per endpoint is 3. Only under special circumstances does this limit increase.

These are all direct methods to control outbound Robocalls. We also implement indirect methods as security measures:

- All logins are protected using Secure login with optional 2FA
- All endpoints require complex authentication and/or IP specific restrictions to make calls
- Endpoints that attempt brute force attacks are blacklisted with no TTL and can only be made active again with permission of Engineering
- Sudden spikes of concurrent calls from any Account immediately alert Engineering for investigation.



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- Hard system limits are put in place against all Accounts to prevent abuse of outbound calls.
- We have outbound blocks to high rate routes internationally and Domestically.
- All notable suspicious traffic from outside the US to our system is blocked at the IP level
- We filter most outbound attempts that originate from outside the Domestic US

STIR/SHAKEN

US IP Communications has completed implementing full STIR/SHAKEN across all of our platforms. We reached full implementation at the beginning of Q3 2022, utilizing 3rd party utilities, such as TransNexus/ClearIP, to fulfill the need.

US IP Communications is already set up to fully comply with any TRACEBACK requests needed with a 1 business day turnaround. We keep records of all calls from every endpoint that cross our network at the SIP level and can quickly determine, isolate, and shutdown the offender.



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