

Robocall Mitigation Plan

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Overview

YouMail, Inc. ("YouMail") provides an OTT-based application that is available on all major cellular communication service provider networks as well as many smaller network operators. A core aspect of the YouMail service involves call forwarding inbound calls to our voicemail and analytics platform. In this capacity, YouMail is a virtual network operator that relies upon the radio and core network of commercial mobile radio service providers.

To support industry robocall mitigation efforts, YouMail has implemented STIR/SHAKEN to sign its own originated calls and validate inbound calls originating from other service providers. While YouMail's unique content-based analytics system has extremely high efficacy and is inherently designed to protect our app users from unwanted inbound calls, we view STIR/SHAKEN data as an important diagnostic tool to measure the effectiveness of other network providers with respect to robocall mitigation.

Purpose

YouMail's purpose is to stop illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates YouMail's RMP.

YouMail's Business Operations Affecting End User Subscribers

Inbound call blocking and voicemail service account for most of YouMail's network call traffic. These services include advanced auto-attendant and call management features, including call forwarding. YouMail also offers Voice over Internet Protocol ("VoIP") calling services through iPhone & Android apps. Phone numbers are provided to customers of tiered paid plans. Such customers are often independent or small business owners looking for a separate business phone line, while using their existing cellphone.

YouMail leases telephone numbers from upstream service providers and does not directly own North American Numbering Plan ("NANP") number blocks and does not lease, resell, or otherwise make them to other service providers. YouMail does not provide origination or termination service to any other service provider.

YouMail operates an all-VoIP telephony network and has no Time Division Multiplexing ("TDM") infrastructure. Outbound calls reach the Public Switched Telephone Network ("PSTN") through its downstream service providers.

STIR/SHAKEN Compliance Status

YouMail has a full STIR/SHAKEN implementation and signs all outbound calls. A-level attestation is reserved for established accounts that completed an enhanced KYC process.

Robocall Mitigation Plan Specifics

Service Limitations

The YouMail apps and web portal do not support SIP Trunking, SIP Registration, APIs (Application Programming Interfaces), or other integrations for mass calling. Outbound calls are manually initiated by the subscriber through a dial pad interface or by selecting from a contact list. The service is not designed to support automated calling or outgoing pre-recorded messages.

Know Your Customer

YouMail follows *NANC Caller Authentication Anchor Trust Working Group*¹ best practices for subscriber vetting. Specifics follow.

New Subscribers

All new subscribers are verified via automated telephone call or SMS to a mobile telephone number; new subscriptions are not permitted from non-fixed VoIP numbers. Landlines, including fixed VoIP, may be supported on a case-by-case basis. Separate fraud controls are applied to credit card transactions by external payment processors.

All new subscriber activity is monitored as further explained below.

Existing Subscribers

Daily reporting provides a risk score based on an account's behavioral indicators, including but not limited to billing plan changes, new telephone number acquisition, sign-in activity, and messaging. Such risk scores are regularly reviewed by our risk prevention team. Further review may occur based on individual circumstances.

¹ *Best Practices for the Implementation of Call Authentication Frameworks*
(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

Terms of Service

YouMail maintains Terms of Service ("TOS") that subscribers must agree to before being permitted to use YouMail's network and services. Among other things, this TOS prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal laws;
- violating applicable industry accepted guidelines; and
- using YouMail's service to engage in or in connection with fraudulent activities.

YouMail's contractual terms with subscribers specify that YouMail may take action, including suspension or termination of service, for violation of the TOS.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by YouMail for use by the subscriber. YouMail tracks these numbers in its inventory system and monitors the assignment of these numbers. Subscribers can only originate calls from their assigned TNs. When YouMail forwards a call, we will C-attest the diversion.

- Investigate Suspicious Activity and Participate in Traceback Efforts

When the presence of illegal robocalling is suspected, our risk prevention team follows defined procedures to investigate such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand their particular use case and validate that the activity belongs to that subscriber.

YouMail cooperates with the Industry Traceback Group (ITG), as well as its upstream service providers, to act promptly on any notices of fraudulent activity related to its numbers. Upon being notified of any such fraudulent activity (either via external party or internal monitoring), YouMail promptly performs a thorough investigation. This includes, but is not limited to, the following:

- Correlation of the reported, fraudulent call event(s) to its internal CDRs (Call Detail Records)
- Identifying whether such calls originated by YouMail, were diverted through YouMail as an intermediary, and/or whether they were the result of caller id spoofing

- Full call traffic pattern analysis and scrutiny of suspicious call activity on the account(s) linked to the given number(s)
- Summarizing the findings, which are then shared with the entire risk prevention team
- Immediate and decisive action taken on the violating account(s), as appropriate, including the termination of service
- Notification to account holders of their Terms of Service violations and service revocation.

Plan Updates

This plan and industry best practices must evolve in response to the dynamic nature of mitigating illegal robocalling. YouMail will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, YouMail will republish it to employees, consultants and contractors and file such an update to the FCC (Federal Communications Commission) Robocall Mitigation Database within ten (10) days of such update.