

Harmon Voice Solution Robocall Mitigation Plan

Harmon Voice Solutions, LLC for itself and on behalf of its affiliates (“HVS”) hereby submit this Illegal Robocall Mitigation Plan to the Federal Communications Commission (FCC) pursuant to the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

1. HVS is an active participant in the USTelecom Industry Traceback Group (“ITG”) as a Voice Service Provider. HVS fully participates with the ITG in order to: (a) provide for the robust protection of voice networks and users of said networks from fraudulent, abusive and/or unlawful robocalls; (b) reduce the number of illegal robocalls; (c) identify the source of robocalls through Traceback and Trace Forward procedures as defined in the ITG policies and procedures; and (d) implement Do Not Originate (DNO) procedure when requested by governmental agencies through USTelecom. HVS is a Voice Service Provider as defined by the ITG Policies and Procedures. HVS takes all necessary steps to ensure it does not meet the definition of a Non-Cooperative Voice Service Provider.
2. HVS provides services to retail customers, call centers, and small to medium sized businesses. HVS requires that potential customers complete comprehensive customer profiles that include legal information, industry and professional references, SIC, tax, and other information pertinent for ANI. HVS has implemented the following onboarding restrictions to mitigate the risk of illegal robocalls originating on our network
 - a. HVS restricts the use of Predictive/Power Dialers on our network.
 - b. HVS requires the submission and review of training material and policies and procedures manuals for prospective customers engaged in outbound telemarketing.
 - c. HVS requires outbound telemarketing customers maintain recordings for all outbound marketing calls for a minimum of 12 months where permissible.
 - d. HVS limits the speed with which calls maybe originated on our network.
 - e. HVS customers may only originate calls asserting caller ID information assigned to that customer in our internal CID database.
 - f. HVS manages the telecom equipment for all customers that originate traffic on our network.
3. HVS’s experienced telecommunications personnel continually monitor our network to identify and mitigate irregularities. HVS monitors traffic patterns and volumetric data to reduce illegal robocalls or fraudulent traffic. When HVS identifies potentially fraudulent, abusive, or illegal robocalling patterns; it acts to quickly mitigate those activities. Mitigation efforts include:
 - a. Blocking or rejecting known fraudulent or abusive traffic or invalid calling number using the appropriate Session Initiation Protocol (SIP) response codes.
 - b. Blacklisting abusive accounts, IP Addresses, or phone numbers.
 - c. Reporting instances of irregular activities to our customer.
 - d. Requiring the customer to remediate and detail the cause of irregular traffic.
 - e. Suspending or terminating customer accounts for violations.

4. HVS requires customers to engage in interoperability testing with our staff prior to onboarding. The company does not automate this process so we can physically interact with customers prior to allowing them to pass traffic on our network.
5. HVS has implemented STIR/SHAKEN and respects the handling of Asserted information using tokens.