

IP Networked Services, Inc. Robocall Mitigation Plan

IP Networked Services (“IPNS”) is a reseller of voice over Internet Protocol (VoIP) service to vehicle dealerships in the United States. This Robocall Mitigation Plan describes the specific steps that IPNS takes to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

IPNS has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic.

As part of its onboarding process for dealership customers, all prospective business customers participate in an in-person or telephonic enrollment process. In addition, IPNS investigates the prospective business customer's background, taking steps such as checking for a company website, determining how long the business has been operating, and confirming their corporate status with the applicable State Secretary of State's office or website, along with other indications of a legal, operating business. IPNS collects and verifies the following data on prospective business customers as part of its investigatory process:

- Physical business location
- Contact person(s)
- State or country of incorporation
- Federal tax ID number

Furthermore, IPNS has an Acceptable Use Policy that permits it to suspend or terminate the services of a customer engaged in illegal robocalling or otherwise abusing our services.

IPNS receives alerts related to any suspicious calling patterns (such as short duration outbound calls) that suggest a customer may be engaged in illegal robocalling.

Finally, IPNS commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.