

Robocall Mitigation Plan

Subscriber Vetting

NovoLink will vet the identity of retail and wholesale subscribers, in conjunction with approving an application for service, provisioning of network connectivity, entering into a contract agreement, or granting the right-to-use telephone number resources.

- Wholesale Transport – where NovoLink provides intermediate transport services or termination services to its wholesale subscribers.
- Wholesale Resale – where the reseller serves retail end-users using the facilities-based platform of NovoLink.
- Retail – where NovoLink serves retail end-users using from the NovoLink platform.

Accurately defining the terms “subscriber” and “caller identity” will establish the proper context for relationships between the two terms. The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber.

Telephone Number (TN)-based caller identity - the originating phone number included in call signaling used to identify the caller for call screening purposes. In some cases, this may be the Calling Line Identification or Public User Identity. In other cases, this may be set to an identity other than the caller’s Calling Line Identification or Public User Identity.

In other words, the TN-based caller identity represents the telephone number used in a telephone call that is uniquely associated with a subscriber.

	Wholesale Transport	Wholesale Resale	Retail
NovoLink will confirm the identity of new customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer’s business.	X	X	X
Confirm on an initial and annual recurring basis whether the customers are an FCC Form 499-A filer in the FCC Form 499 Filer Database6 or intermediate provider registration system.	X	X	
If a customer is not a FCC Form 499-A filer, the wholesale service provider should understand the nature of the Customer’s business that exempts them from being a Form 499-A filer.	X	X	

Mitigation Through Contracts

Require Traceback Cooperation in Contracts

For all new and renegotiated contracts governing the transport of voice calls, NovoLink will use best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying its own customer if the call originated in its network.

Acceptable Use and Terms of Service

All NovoLink customers are subject to our *Acceptable Use Policy* and *Terms of Service* as laid out in the *NovoLink Master Services Agreement* along with its schedules and appendixes. These contracts define the acceptable and unacceptable usage that customers must adhere to while using the NovoLink network as well as any consequences for violation of these parameters.

Telephone Number Validation

NovoLink will attempt to confirm the subscribers right to use a telephone number as necessary and appropriate.

	Wholesale Transport	Wholesale Resale	Retail
Confirm subscribers right to use a telephone number by requiring a valid letter of authorization to provision that telephone number for use in NovoLink systems.		X	X
Disallow outbound calls from telephone numbers that do not exist as a provisioned subscriber on the NovoLink network.		X	X
Disallow outbound calling in instances where subscriber devices cannot securely authenticate and meet specific matching requirements to ensure validity.		X	X
Accept domestic US traffic only from voice service providers listed in the Robocall Mitigation Database beginning September 28, 2021.	X		

Monitor Traffic with Analytics

NovoLink DOES use in-house tools that analyzes our network traffic to identify and monitor patterns consistent with robocalls. The following represent examples of several monitoring metrics used:

- Week over week traffic trending is monitored which can help to indicate a change in typical traffic patterns.
- Irregular patterns and anomalies related to call duration and frequency to single or multiple destinations.
- Limitations on simultaneous calls being placed by a single subscriber for wholesale resale and retail customers.

NovoLink does NOT use a third-party vendor or vendors that provide call analytics systems.

Investigate Suspicious Activity

NovoLink investigates suspicious calls and calling patterns. If a pattern consistent with illegal robocalls is detected, or if there is reason to suspect illegal robocalling or spoofing is taking place over our network, NovoLink will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action.

Cooperation in Traceback Investigations

NovoLink is committed to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (Industry Traceback Group or ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Mitigate Suspicious Calls and Calling Patterns

If, after investigation, NovoLink learns its own systems and/or end users are generating suspicious calls and calling patterns, or that it is the US point of entry for such suspicious traffic, NovoLink will take steps to mitigate calls that are found to be unlawful by taking appropriate action which can include actions as severe as blocking traffic.

NovoLink will make all efforts to implement any *Do Not Originate* requests it receives from the ITG.