



ROBOCALL MITIGATION PLAN

In accordance with the Federal Communications Commission (FCC) adopted rules requiring voice service providers to implement STIR/SHAKEN caller ID authentication technology in support of the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the FCC has additionally required that all providers certify in the Robocall Mitigation Database. This certification will verify the provider has either implemented STIR/SHAKEN or has a detailed program plan that ensures they are not originating illegal robocalls.

NobelBiz, Inc. is in full support of the FCC regulations and is committed to combating any illegal robocalling and fraudulent behaviors across its network. This is achieved through a series of policies and system processes designed to prevent, identify and/or remediate this unwelcome activity. This document outlines the series of measures taken in order to protect the consumers and is designated as NobelBiz's Robocall Mitigation Plan.

1. KYC – Know your Customer

Prior to entering into business with a new customer, there are series of discussions between the parties to ensure the customer's needs align with the services NobelBiz can provide. This process establishes responsible party individuals as well as provides an understanding of the customer's nature of business. Additionally, internal policy is to vet the legitimacy of the business using various resources such as Secretary of State business search to verify state or country of incorporation and/or physical address prior to execution of a legally binding contract. NobelBiz may also require completion of a credit application, as needed.

The contract outlines the terms of use of services which include responsibility to adhere to all applicable local, state and federal laws as well as industry guidelines. The contractual terms specify customer's use of the services or products for any unlawful purposes or in an unlawful manner will result in immediate suspension or termination of services or products.

2. STIR/SHAKEN Implementation

NobelBiz has upgraded its entire network to support the STIR/SHAKEN framework and fully implemented call signing across all customers and vendors.

The level of attestation applied for the calls is based on the following policy:

Attestation Applied:

- Full Attestation (A) - NobelBiz client using NobelBiz provided phone number or elevated via NobelBiz attestation policy.
- Partial Attestation (B) - NobelBiz client using a non-NobelBiz provided number without elevating via NobelBiz attestation policy.
- Gateway Attestation (C) - No direct relationship with NobelBiz and using a non NobelBiz provided number.

NobelBiz Attestation Policy to Elevate from B to A:

NobelBiz client using non-NobelBiz number owned by NobelBiz client

- NobelBiz client must provide either a recent invoice showing company name matching Nobelbiz client name and number(s) in question or CSR (customer service record) with company name matching Nobelbiz client name and number(s) in question.

NobelBiz client using non-NobelBiz number NOT owned by NobelBiz client

- Owner of number to provide recent invoice showing company name who owns the number in question or CSR (customer service record) with company name and number in question.
- Owner of number to provide LOA (Letter of Authorization) giving permission to NobelBiz client to use number in question.

3. Network monitoring

NobelBiz uses several monitoring systems and alerts in order to detect and block any illegal activity in our network.

- Traffic KPIs monitoring – Answer Seizure Ratio, Average Call Length, Calls per Second, Short Duration Calls.
- Repeated calls to a phone number or similar phone numbers.

- Calls coming from Invalid numbers or Unassigned blocks of phone numbers for public use.
- ANI spoofing alert, in the case a customer uses NobelBiz phone numbers that are not assigned to their account.

4. Traceback Requests

NobelBiz is committed to protecting the telecom networks and consumers from fraudulent robocall traffic by following ITG recommended best practices and providing full and within 24 hours cooperation in traceback investigations. NobelBiz process defines specific resources responsible for investigating identified and/or reported suspicious activity and responding with needed information. Where applicable, action such as contacting customers to correct any improper use of the products or services or blocking use of services will be taken. Incorporation of terms for customer cooperation in traceback requirements is being addressed in new and renegotiated customer contracts. The company's contact e-mail distro that is monitored 24/7 is stirshaken@nobelbiz.com. Nobelbiz team can also be reached by phone number at +1 800-601-7411.

5. Call Blocking

NobelBiz uses an automated system that blocks traffic originated from ANIs in the DNO list offered by US Telecom, as well as calls coming from invalid numbers (unassigned, pending, special NPA-NXX-Y).

Respectfully Submitted,

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