

Robocall Mitigation Statement

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CallWorks Corporation is committed to detecting, avoiding, and blocking robo-dialed traffic. We follow industry best practices to enable our efforts. CallWorks Corporation is both an intermediary carrier and originating carrier hence Callworks originates traffic and additionally passes customer originated traffic. The CallWorks Corporations' traffic is originated by small businesses and carriers on other networks and is transited to CallWorks Corporation already signed and "Attested". CallWorks Corporation passes the Token and Attestation level that is sent by the originating carrier. CallWorks also originates some traffic for it's DID customers and that traffic is Stir & Shaken attested.

CallWorks Corporation uses a multi-faceted approach in our mitigation strategy. These include:

1. We know our customers' businesses and monitor them closely:
 - a. Enterprise: We verify that the corporate entity and business purpose is legitimate.
 - b. Telecoms: We verify that telephone numbers are being legitimately used.
 - c. Use Case: Verify and educate customers regarding vertical, opt-in, and calling practices.
 - d. Identity: Validate and update CallerID, CNAM, & verified calls.
2. Stir/Shaken
 - a. We have updated our SIP software to allow the Stir and Shaken tokens/messages to be passed from the traffic originators to our traffic termination companies. We have completed the Stir/Shaken testing process and validated that all information is being passed correctly.
 - b. We partner with vendors that already implemented Stir/Shaken in their network or will have done so by June 2021.
3. Traceback/USTelecom
 - a. We actively participate in the Traceback community including the FCC, law enforcement and the industry traceback consortium.
 - b. We require all peering customers to be US based, have an active FRN and to be an FCC 499-A contributor.
4. Audit and monitoring
 - a. We constantly monitor traffic statistics and metrics such as CPS, ASR, ACD, failure type (SIP Q.850 codes). We have placed Call Blocking and Traffic auditing software in place to alert and block as much illegal robocalling as possible.
 - b. We take seriously all FCC Complaints. We investigate these diligently and work directly with customers to improve their behavior or remove them from our network if their call patterns do not improve.

At CallWorks Corporation we take Robo-call mitigation seriously. We believe our current practices put us in line with best in class practices; however we continuously look for ways to improve and stay abreast of new approaches to reduce Robo-calls.

Sincerely,

Andrew Mangold

Andrew Mangold
President and CEO
CallWorks Corporation