

NetDiverse, LLC
ROBOCALL MITIGATION PLAN

I. Background

Under the authority Congress granted the Federal Communications Commission (“FCC” or “Commission”) in the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the Commission has adopted rules requiring voice service providers, like NetDiverse, LLC (“NetDiverse”), to implement STIR/SHAKEN caller ID authentication technology in the Internet Protocol (IP) portions of their networks. 47 CFR § 64.6301.

The FCC requires that all voice service providers certify in the Commission’s [Robocall Mitigation Database](#) whether they have implemented STIR/SHAKEN or, if subject to an applicable extension, which NetDiverse is because it has less than 100,000 lines in service, that they have documented and instituted a robocall-mitigation plan to help combat the origination of illegal robocalls on their networks.¹ The Commission has explained that a robocall-mitigation program is sufficient if the detailed practices in the plan can “reasonably be expected to significantly reduce the origination of illegal robocalls” and the voice service provider complies with the practices it describes in its filings.

NetDiverse is dedicated to stopping illegal calls from originating on its network and undertaking commercially reasonable efforts to monitor the calls coming into its network, consistent with FCC regulations and its “[Best Practices](#)” guidance.

This document outlines NetDiverse’s Robocall Mitigation plan.

II. NetDiverse’s Know Your Customer (“KYC”) Standards

NetDiverse is a voice service provider that focuses its business and operations on the business segment of the voice services communications market. As part of its customer-onboarding process, NetDiverse undertakes various commercially reasonable precautions to verify a given customer’s identity as part of entering into a formal written agreement. NetDiverse personnel are personally involved in the customer-onboarding process, and in that connection oversee the onboarding of the prospective customers, with a particular emphasis on customers with multiple lines available. Among other data points collected and, as appropriate, verified, as part of those processes NetDiverse gathers the following customer-identifying facts and circumstances:

- Customer business name,

¹ See <https://docs.fcc.gov/public/attachments/DA-21-454A1.pdf>; 47 C.F.R. § 64.6304.

- physical business location,
- contact person(s),
- Email address, and
- Valid, verified US-based payment method.

NetDiverse does not and will not have any wholesale carrier or wholesale business clients. NetDiverse only sells to professional business and education clients. NetDiverse manages the PBXs and telephones for nearly all of its clients. For every client utilizing trunks to connect to the NetDiverse network, we limit the number of trunks for the represented commercial business purpose provided by the client. NetDiverse is aware of the prohibition against accepting outbound traffic directly from another voice service provider that is not listed in the FCC's Robocall Mitigation Database. We do not and will not sell to other voice service providers.

III. NetDiverse's Contractual Policy regarding the Use of voice Service

NetDiverse's customers are required to comply with NetDiverse's Use of Service policy:

Customer may use the Service for any lawful purpose provided that: a) such use does not interfere with or impair service over any of the facilities and associated equipment constituting NetDiverse's network; b) such use does not impair the privacy of any communications over the facilities and equipment of NetDiverse; c) Customer will use the Service in accordance with all laws and regulations, and the terms and conditions contained in this Schedule and NetDiverse's applicable tariff; and d) Customer may not use the Service for outbound call center (or similar enterprise), 900/976 based or other information or entertainment services, telemarketing, autodialing, continuous or extensive call forwarding, fax broadcast, or fax "blasting." NetDiverse may make changes to the Service provided that any such change will not materially adversely affect the performance of the Service. NetDiverse reserves the right to immediately terminate the Service if NetDiverse determines, in its sole discretion, that the Customer has violated any term of this Schedule.13.1 Customer agrees to use the Service solely for Customer's own internal purposes. Customer shall not use the Service, either on a stand-alone basis or in combination with any other services or products, to provide any telecommunications or other service to a third-party. Any such use by Customer shall be deemed a default under this Agreement.13.2 Customer is solely responsible for the content of any transmissions of Customer and any third party utilizing Customer's facilities or NetDiverse's facilities; use of other organization's network or computing resources are subject to their respective permission and usage policies. Customer shall limit access to and use of the Internet Services to its employees and end-users solely for Customer's business purposes. Customer agrees to abide by NetDiverse's Acceptable Use Policy and Privacy Policy, each as amended from time to time, and to require any and all employees, contractors, end-users or other representatives using the Customer's Internet Services to abide by same, each can be found at www.netdiverse.com/aup and www.netdiverse.com/privacy respectively.

IV. Telephone Number Authorization and STIR-SHAKEN Capabilities

NetDiverse fully deployed STIR/SHAKEN in its voice network.

V. Proactive Network Monitoring

NetDiverse can and does analyze traffic on its network for potentially suspicious traffic patterns that are likely to be associated with illegal robocalls or other potentially unlawful usage. For example, NetDiverse's network systems are capable of assessing traffic based on various criteria, including data relating to short-duration calls, answer-seizure ratios, and other anomalous call patterns.

If NetDiverse detects a pattern consistent with illegal robocalls, or has reason to suspect illegal robocalling or spoofing is occurring on its network, NetDiverse will take prompt action to identify the party that is using its network to carry these calls and take appropriate action. Once suspected unlawful traffic is discovered, NetDiverse will block any further traffic from being carried from the source of that suspicious traffic. In the event NetDiverse discovers any suspicious traffic that is not demonstrably unlawful, NetDiverse will complete its investigation, and their service can be temporally suspended while that process is completed depending on the severity of the complaint.

VI. Commitment to Traceback Cooperation

NetDiverse commits to timely cooperating with and responding to Traceback requests from the ITG (or any successor entity designated by the FCC), trace-forward investigations, and other valid law enforcement and government demands, subpoenas, and other valid legal processes. NetDiverse will dedicate sufficient resources to provide prompt and complete responses to such requests. NetDiverse will investigate suspicious activity found by its monitoring systems or reported to it by consumers or third parties and take appropriate action.

VII. Gateway Provider Status

NetDiverse is not a Gateway Provider. We only provide services to Commercial Businesses and Schools. Because we are not a Gateway Provider, we do not have a requirement to know our upstream carrier. We define our "upstream carriers" as the carriers that provide us trunking to then provide that trunking to our customers. We have been working with the carriers that provide us with trunking for more than 8 years each. Although there is no requirement for us to know our upstream carriers, we do know them well.

VIII. Blocking Robocalls

We utilize tools from TransNexus and VoIP Monitor to manage and monitor the calls in our network. Since 95% of our customers utilize the PBX software we provide to them, we control the ability and thus eliminate the ability for them to place robocalls. For the two clients where

we do not manage the PBX software and hardware, we monitor their usage to ensure they do not perform any robocalling. We also know them well, and robocalling does not align with their businesses of a small engineering firm or a boarding school.