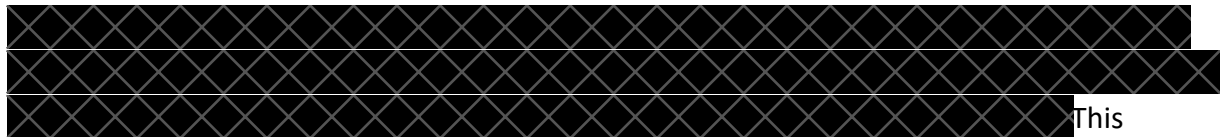


FCC Robocall Voice Mitigation Plan and STIR/SHAKEN Status (v.2024-01-01)

BACKGROUND



This document provides details on how Number Access meets the FCC Order obligations for voice service providers which were defined as follows:

- Respond to traceback requests from the Commission, civil and criminal law enforcement, or the industry Traceback Group (ITG).
- Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau.
- Implement effective measures to prevent new and current customers from using its network to originate illegal calls.

ROBOCALL VOICE MITIGATION PLAN

The Number Access Robocall Mitigation plan to meet the requirements defined above consists of the following:

1. Traceback Response

Number Access agrees to comply with efforts to traceback the source of suspected robocalls.

- All Commission, law enforcement, and industry traceback consortium (or ITG) requests will be responded to within 24 hours. Any non-exigent requests that do not require a 24-hour response should be noted in the request.
- Response and on-going cooperation with these entities will be provided to assist with investigations and efforts to stop callers that use our services to originate, carry, or process illegal robocalls.
- Investigate and traceback requests received directly from carriers, industry associations, and other recognized and creditable authorities.
- Voice call records are created for all calls and are searchable.

All traceback requests are encouraged to use the email only contact method unless the request is of an exigent nature. Traceback requests can be made through the following contact:

Number Access Abuse
abuse+fccrcmp@numberaccess.com
(563) 362-9999

2. General Mitigation

Number Access will continue to assist with mitigating suspected illegal activity that is within its control when the Commission has provided notification through its Enforcement Bureau. Any customers reported and confirmed to be initiating any traffic that is not consistent with our Acceptable Use Policy will be notified and action will be taken, including immediate suspension, and possible service termination, unless a legal order prohibits the action or customer notification. Number Access also implements Know Your Customer processes on all engagements with customers to understand their business and use case for communications services.

3. Illegal Voice Call Origination

Number Access captures use case details for existing and new customers. With the exception of voice test call services, [REDACTED]

STIR/SHAKEN STATUS

Number Access has implemented the STIR/SHAKEN authentication framework in its Voice network as of June 1, 2021. *Reference industry implementation requirement 47 CFR § 64.6301.*