

White Label Communications, LLC

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by White Label Communications, LLC (“White Label”) to mitigate and eliminate illegal robocalling. White Label has an ongoing commitment to help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

White Label provides Voice over Internet Protocol (“VoIP”) calling services on a wholesale-only basis to VoIP resellers who in turn service the end-users. All telecom services are provided on a wholesale-only basis. White Label works closely with our upstream vendor’s assistance to monitor networks for fraudulent voice calling patterns.

Know Your Upstream Vendor

White Label Communications, LLC has master service agreements with Bandwidth.com, Inteliquent, Telnyx, Peerless Networks, Level 3 / Lumen, VoIP Innovations, and ThinQ and has received written assurances from their officials that it has and will continue to sign calls submitted to White Label Communications, LLC and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to White Label. White Label and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

White Label’s business model focuses on wholesale selling to resellers. Our clientele primarily consists of Managed Service Providers (MSPs) and Internet Service Providers (ISPs). These resellers, in turn, market our products to end-user companies, taking full responsibility for the vetting process of these final customers.

Companies who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by White Label as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

White Label is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. White Label will devote sufficient resources to provide prompt and

complete information to traceback requests. Our points of contact to handle all traceback requests are:

Brian Behmke
Support Team Manager
bbehmke@whitelabelcomm.com

Joe Baran
Engineering
jbaran@whitelabelcomm.com

Support Team
support@whitelabelcomm.com

Our support team manager or one of our admins receive the requests and respond promptly.

Telephone Numbers

Resellers are required to supply an up-to-date customer invoice, specifically one that details the phone numbers under their ownership. This invoice should be no older than 60 days. Furthermore, to proceed, the customer must execute a Letter of Agency (LOA), which serves as a formal certification of their ownership of the telephone numbers intended for porting to the White Label platform.

International Calling

White Label is not currently an international voice services provider. If at any time White Label does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our upstream vendor to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, White Label must rely on our upstream vendor and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

Our platform strictly prohibits customers from spoofing telephone numbers for outbound calls. Customers are required to have ownership of the telephone numbers that appear on the outbound caller ID. We partner with reputable origination carriers, including Bandwidth.com, Inteliquent, Peerless, and others, to maintain the integrity of our services. A critical condition for White Label when choosing carrier partners is their inclusion in the robocall mitigation database.

and their full compliance with all associated regulations. This ensures the highest standards of call authenticity and security for our users.

White Label Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

Brian Behmke, Support Team Manager
710 Springdale Drive
Exton, PA 19341
215-987-4500
bbehmke@whitelabelcomm.com