



The AVOXI Robocall Mitigation Plan

This robocall mitigation plan is for AVOXI, Inc. (AVOXI).

Headquarters:

300 Galleria Parkway, Suite 610,
Atlanta, Georgia 30339

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users
- A gateway provider with a STIR/SHAKEN obligation
- A non-gateway intermediate provider with a STIR/SHAKEN obligation

AVOXI has not been prohibited from filing a certification in the Robocall Mitigation Database.

AVOXI does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

AVOXI uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

AVOXI has and follows a robust customer vetting process.

Additionally, our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to monitor for the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list. Additionally, we run other system generated reports to identify and investigate suspected illegal robocalls.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Voice service provider prospects are issued a questionnaire against which their responses are reviewed and crossed checked, including against the FCC Robocall Mitigation Database.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

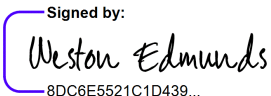
We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 735J. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17. which requires truthful and accurate statements to the Commission.

Signed by:

Signature: 8DC6E5521C1D439...

Name: Weston Edmunds

Title: EVP