

NOBEL, LTD. ROBOCALL MITIGATION PLAN:

1. Nobel, LTD. (hereinafter referred to as the “Company” or “Nobel”) continuously analyzes and reports unusual traffic sent by any customer, comparing such traffic from outbound call volume, short duration call percentage, calls that receive SIP Code 403/487 percentage. Each variable will trigger an internal alert and by all means, specialized fraud team will notify the customer on each of those, as below:
 - If the percentage of short duration calls (calls less than 6 seconds) exceeds more than 15% and over 100 calls in any one-hour period.
 - If the combined percentage of SIP Code 403, 487 exceeds 30% and over 100 calls in any one-hour period.
2. Nobel commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. We have established a 24/7 available email address for creating tickets with the highest priority requiring a response within one business hour. We keep Call Detail Records for a period of one calendar year. The moment we receive any complaints, we answer on a timely manner by notifying client.
3. Although our voice network is not currently fully STIR/SHAKEN compatible, Nobel allows pass-through any certificates as received from our customers.
4. Nobel encourage customers to use the Do Not Call Registry and to educate them about robocalling and how to avoid scams and fraud.
5. Nobel is currently evaluating the options for implementation of STIR/SHAKEN across our voice network. Since our network is built with multiple voice platforms, it is increasingly difficult and time consuming to implement and maintain it, but we strongly believe we would manage the migration to implement full STIR/SHAKEN compatibility, to comply with all FCC’s requirements.

Respectfully,

Nobel, LTD.

By:

Signature

25.06.2021

date

Name:

Alin Gherman

Title:

Attorney in fact