



Robocall Mitigation Plan

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

We use software provided by TransNexus to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

Upstream Provider Knowledge

We know all carriers from which we receive traffic and have confirmed that all such carriers are listed in the Robocall Mitigation Database. We monitor incoming traffic from connected carriers for suspicious call patterns indicative of illegal robocall activity. Connected carriers are notified of any suspicious or illegal traffic and advised that failure to remediate may result in blocking. We are incorporating traceback and prohibited traffic language into agreements with new upstream carriers.