

ROBOCALL MITIGATION PROGRAM

Speedflow Communication Limited is a privately-owned UK-based company. The company acts as an intermediate voice services provider that doesn't have its own subscriber base within the United States.

Being an intermediate voice service provider, we operate with NANP (North American Numbering Plan) traffic that is a subject of this Robocall Mitigation Plan.

As a foreign voice service provider, Speedflow is in the process of implementation the STIR/SHAKEN call authentication framework into our network infrastructure and will integrate it as soon as possible.

Our robocall mitigation and prevention steps include but are not limited to the following:

1. Speedflow Communications Limited cooperatively participates in the industry traceback consortium, providing all required details about the company.
2. We are doing our best to respond fully and timely to all traceback requests, received from authorities, for calls for which we act as an intermediate provider.
3. When we receive a traceback request from the authorities, we inform the carrier from which we received the call and ask them to take reasonable steps to identify the call origination party.
4. We use our 24/7 network operation center as well as internal tools to monitor and analyze voice traffic that we receive from other carriers.
5. We review CDRs and block any traffic that may appear suspicious.
6. Speedflow Communications Limited Legal team prior to interconnection of new customers: a) makes sure we have an agreement in place, preferably, we should use our agreement template; b) requests certificate of incorporation of companies; c) verify registration number address, authority of the signor, other contact information.
7. According to our policy postpaid customers are credit vetted to evaluate the credit record and reputation of the customer.
8. Internal fraud policies ensure that clients who have for one reason or other, knowingly committed any of the telecom fraud within our network are suspended of services until the full investigation of the case.
9. As a part of the Robocall Mitigation Program, we guarantee to perform other reasonable steps to avoid illegal robocall traffic in our IP network.

Speedflow will review this Robocall Mitigation Plan and update it as necessary to meet the requirements of applicable laws.

Approved by

Vladimir Ellis
CEO