

## **Robocall Mitigation Program**

Jade Communications LLC (Jade) is a reseller of voice over Internet Protocol (VoIP) service. Our wholesale network provider is Blanca Telephone Company d/b/a Blanca Networks. This Robocall Mitigation Plan describes the specific reasonable steps that Jade has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our wholesale provider's network.

### **Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls**

Jade has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Jade's business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call on Jade's network, we personally know, or get to know, the business owners and/or management. This personal touch gives Jade a clear view of whether the business is a risk for originating illegal robocalls.

Jade has never received a request for high-volume origination services. However, were Jade to ever receive such a request, we would exercise caution and extensively investigate the requesting entity prior to providing service. In particular, we would collect information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

### **"Know-Your-Upstream Provider" Procedures**

Jade relies upon the "Know-Your-Upstream Provider" procedures of its wholesale provider, Blanca Telephone Company d/b/a Blanca Networks. Jade is confident that Blanca Networks exercises due diligence before accepting traffic from an upstream provider.

### **Use of Call Analytics Systems**

Jade does not presently use any call analytics systems to identify and block illegal robocall traffic.

### **Commitment to Respond to Traceback Requests**

Jade commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its services to originate, carry, or process illegal robocalls.