

Toolani Robocall Mitigation Plan

June 2021

Toolani is a foreign small voice service provider offering prepaid international calling. To use our international calling service, customers need to register their actual phone number (CLI) in addition to a username and password. Calls with no CLI or from a CLI unknown to our system will be automatically blocked. Toolani does not provide any CLIs.

Customers call US access numbers from their own phone number they signed up with at Toolani. Our system will then connect this call to the international phone number they want to reach. Calls are originated in the US and terminated outside the US. US customers can not make calls to US phone numbers through Toolani. Our customers can also only make calls but not receive any with our service.

Our customers make a few calls per week only and mostly to the same international phone numbers of friends and family living abroad. Calls with an unusually high volume will therefore be automatically analyzed in detail.

Using internal and external tools, Toolani checks fraudulent behaviour while registering for Toolani and while using our service. When signing up for our prepaid service, we have multiple automatic checks such as CLI format and IP check running in the background to detect any suspicious users using our service. Automatic checks are in place that will block any account that appears to be suspicious.

Toolani has a 24/7 live traffic monitoring in place with immediate alerts when suspicious traffic is detected by our system. Examples for suspicious traffic are:

- High volume of calls
- Calls made to different countries
- Calls made to a unusual amount of different numbers
- Unusual calling patterns such as very short calls
- Calls to numbers on our internal blacklist

Toolani is dedicated to not allow any robocalling from its network. Traceback requests will be processed quickly and in time.