

Evolution Voice Inc.

ROBOCALL MITIGATION PROGRAM

Robocall Mitigation Program Introduction

Pursuant to the applicable orders and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Program (“RMP”) has been produced. This RMP details the policies and practices that Evolution Voice Inc. has established to prevent unlawful robocalls from originating on, terminating to, or routing through the Evolution Voice Inc. (“Evolution Voice”) network.

Company Summary

Evolution Voice Inc. is part of the Fourteen IP Group Limited group of companies (“Fourteen IP”). Fourteen IP is a Global Systems Integrator to the hospitality industry providing Cloud Telephony and AI Powered Virtual Agent solutions across North America and Europe. Founded in 2011, our services are deployed in over 300,000 hotel rooms across 24 countries. Fourteen IP sells directly and only to leading hotels and groups worldwide and is a preferred vendor for such brands as Marriott, Hilton and Hyatt. Fourteen IP aims to be the most chosen and valued brand in the hospitality cloud communications market by providing product innovation, customer led solutions and outstanding service.

Filing of RMP and Implementation of STIR/SHAKEN

Evolution Voice Inc has fully implemented STIR/SHAKEN. All voice traffic that originates on its network is authenticated with STIR/SHAKEN consistent with 47 C.F.R. § 64.6301(a). Evolution Voice Inc has uploaded this RMP into the RMD because it “details the specific reasonable steps it has taken to avoid carrying or processing illegal robocall traffic” and has included “a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

Robocall Mitigation Program

This RMP applies to the Evolution Voice calling platforms and provides information on Evolution Voice policies and procedures for the topics listed below. These policies detail the “specific reasonable steps it has taken to avoid carrying or processing illegal robocall traffic”:

- (1) Implementing Knowing Your Customer Protocols
- (2) Requiring Contractual Provisions to Mitigate Illegal Robocalls
- (3) Adhering to Prerequisites Before Accepting Traffic from Other Providers
- (4) Automatically Blocking Calls on a Do-Not-Originate List
- (5) Analyzing and Monitoring Network Traffic Routing Through Evolution Voice Network
- (6) Investigating Suspicious Calling Patterns
- (7) Authenticating Voice Traffic
- (8) Responding to Commission, Law Enforcement and ITG Traceback Requests
- (9) Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

1. Implementing Knowing Your Customer Protocols

Evolution Voice Inc. (“Evolution Voice”) vets the identity of its customers, in conjunction with; approving an application for service; provisioning of network connectivity; entering into a contract agreement; or granting the right-to-use telephone number resources. In doing so, Evolution Voice takes affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.

Evolution Voice has implemented appropriate protocols when onboarding new or returning customers and requires them to provide sufficient information to ensure their legitimacy. Evolution Voice generally requires its customers to provide the full legal name of the company (and its parent company if applicable), state or county of incorporation, the physical address of its operations, the billing name and address, the customer contact name and telephone number, federal tax ID (if it is a U.S. entity), and nature of the customer’s business (list is not exhaustive).

Evolution Voice also reserves the right to examine the credit record or other available external sources of credit of any applicant or customer as part of the onboarding process.

2. Requiring Contractual Provisions to Mitigate Illegal Robocalls

Customers of Evolution Voice are subject to robust terms and conditions that obligate customers not to use Evolution Voice’s services for unlawful purposes; and preserve Evolution Voice right to terminate customers for violations of the law.

Evolution Voice requires that their customers enter into an Agreement which includes a termination clause for violations of any laws, rules, and regulations applicable to use of Evolution Voice’s services. Evolution Voice may suspend or terminate the Agreement immediately upon notice if a customer fails to cure any fraudulent or otherwise unlawful activity. The Agreement may also be terminated if the customer commits a breach which cannot be remedied or there has been a violation of any law/ regulation that prohibits the customer from operating in an acceptable manner.

3. Adhering to Prerequisites Before Accepting Traffic from Other Providers

In accordance with 47 C.F.R §64.6305, Evolution Voice only accepts calls from providers who have a filing in the Robocall Mitigation Database.

Evolution Voice uses software from TransNexus to verify the authenticity of a certificate on inbound traffic.

4. Automatically Blocking Calls on Do-Not-Originate List

In accordance with FCC Rules, 47 C.F.R. § 64.1200(k)(2) and (n)(o) Evolution Voice uses 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 immediately 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 terminate their service as appropriate.

5. Analyzing and Monitoring Network Traffic Routing Through Evolution Voice Network

Evolution Voice analyses and monitors the call traffic that originates through the Evolution Voice network. Evolution Voice uses 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. If we determine that the caller was attempting to originate unlawful robocalls, then we terminate their service as appropriate.

6. Investigating Suspicious Calling Patterns

When analysing and monitoring call traffic, if Evolution Voice discovers call patterns that are consistent with illegal robocalling, Evolution Voice, after further investigation, takes appropriate action to address such behaviours and mitigate such traffic. These measures include, but are not limited to, working with the originating customer to resolve problematic traffic, termination of the subscriber originating such traffic, terminating the customer's service or blocking calls, as well as possible referrals to relevant enforcement agencies where appropriate. In the alternative, if the calls are determined to be legitimate, Evolution Voice will memorialize its findings in writing as needed.

7. Authenticating Voice Traffic

Evolution Voice utilises software provided by TransNexus and to the extent technically feasible, authenticates and verifies originator identification information for all SIP calls that transit its own network to the US telecommunications network and that it will exchange with another Voice Service Provider or Intermediate Provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next Voice Service Provider or Intermediate Provider in the call path.

It verifies originator identification information for all SIP calls it receives from another Voice Service Provider or Intermediate Provider which it will terminate and for which the caller identification information has been authenticated.

8. Responding to Commission, Law Enforcement and ITG Traceback Requests

Evolution Voice is committed to ensuring that its network is not utilized for the origination, termination or routing of unwanted and illegal robocalls. In accordance with the FCC's regulations 47 C.F.R. § 64.6305(b)(2) and 47 C.F.R. § 64.1200(n)(1)(ii), Evolution Voice will respond to all traceback requests from the Commission, law enforcement, and the Industry Traceback Consortium ("ITG") within-24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use Evolution Voice network to carry or process calls.

Evolution Voice will take the steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission through its Enforcement Bureau and will comply with the requirements of such notice and do so in accordance with the applicable FCC rules.

9. Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues.

Evolution Voice provides the following name, title, department, business address, telephone number, and email address of the individual within Evolution Voice that leads robocall mitigation-related issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Contact Name:	Mark Kettle
Contact Title:	Head of Evolution Voice
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