

Robocall Mitigation Procedure

Voxology¹ is a U.S.-based communications service provider (CPaaS) that operates as a Voice Services Provider and a wholesale intermediate voice provider to domestic carriers. The company does not operate as a Gateway provider.

Voxology¹ has implemented industry leading steps to mitigate robocalls. The company outlines herein its Robocall Mitigation Program for submission to the Robocall Mitigation Database. Voxology has taken extensive measures to identify its customers, monitor traffic, and respond promptly and thoroughly to investigations of improper telecommunication activity.

I. Entities Covered By Certification

The following entities are all subject to, and, in so much as applicable to their businesses, comply with and carry out the policies and procedures described in this document:

- Voxology Group, Inc.
- Voxology, Inc.
- Voxology Carrier Services, Inc.
- Voxology Integrations, Inc., formerly known as Shoutpoint, Inc.

Voxology Group, Inc. is the direct parent of each of the other entities listed above, and all of these entities are subject to the same robocall mitigation plan. For the purposes of this document, these entities are collectively referred to as "Voxology."

¹ For the purposes of this submission, "Voxology" refers to a number of related entities, identified in section I.

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II. Roles in the Call Chain

A. Definitions

For the scope of this document, Retail shall mean customers utilizing Voxology's APIs to originate calls, or enterprises utilizing SIP trunks to Voxology. Wholesale applies to customers who are telecommunications carriers, either licensed or registered as Intermediate Providers.

B. Retail Traffic

Voxology narrowly focuses its marketing and sales efforts for its retail platform to companies that do not originate illegal robocalls. New and existing customer traffic patterns are monitored for evidence customers may be violating Voxology's permitted uses. Voxology also reviews an account any time a traceback or other investigatory request (such as subpoena) is received to determine if there is any evidence of violations of Voxology's policies. For retail traffic, Voxology is generally the originator in the call chain.

C. Wholesale Traffic

Voxology's wholesale program is designed for and targeted to conversational voice traffic. Customers consistently failing to send traffic consistent with a conversation profile are identified, monitored, and encouraged to modify their traffic profile. Customers are removed from the platform based on these metrics, as well as the identification of problem customers through metrics such as traceback ratio. For wholesale traffic, Voxology serves as an intermediate provider.

III. Implementation of STIR/SHAKEN

Voxology has fully implemented the STIR/SHAKEN authentication framework across its network. When serving as an originator in the call chain, Voxology signs 100% of all calls placed into the US PSTN with a valid STIR/SHAKEN credential. When serving as an intermediate provider, Voxology believes its customers sign all required calls with STIR/SHAKEN credentials. The company does not modify or change the level of certification received. Voxology does have the ability to block calls that are not signed with STIR/SHAKEN and rejects calls that are passed to the company with an invalid/incorrect certification. Further, Voxology actively blocks unsigned calls from upstream carriers it deems should have been able to or that were obligated to sign.

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A. Retail Traffic

Voxology signs all retail calls, with Attestation A or B. Forwarded calls are signed with appropriate diversion technology.

B. Wholesale Traffic

Voxology rejects/blocks unsigned and/or invalid certificate calls from wholesale customers. Calls received with valid certificates are passed to downstream carrier unaltered. The company will block services to a customer if it determines the customer is using the services for illegal robocalling.

C. Overall

Because Voxology signs all calls originating on its network, and receives all calls passing through its network via SIP from US-based providers under the same regulatory framework, Voxology can not identify any basis for signing unsigned calls traversing its network.

II. Efforts To Avoid Originating Illegal Robocalls As Part Of The Robocall Mitigation Program

Voxology works hard to deter and eliminate illegal robocalls from its network through a multi-pronged effort including:

- *Know Your Customer* (KYC) Program.
 - Wholesale customers must provide and/or confirm the following:
 - 1) FCC Registration #
 - 2) Active 499 Filer ID
 - 3) Registered in the RMD Database
 - 4) Confirm as a U.S. Entity
 - 5) STIR/SHAKEN compliance
 - 6) Active website and email address
 - 7) List of officers/principals/controlling persons with 10% or more ownership
 - 8) Description of the business.
- Contractual Provisions
- Telephone Number Validation
- Do Not Originate
- Investigating Suspicious Calls
- Responding to Commission, Law Enforcement and ITG Traceback Requests

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- Company-wide Training
- Marketing Call Standards
- Active Industry Participation

Voxology is dedicated to adhering to the entirety of the federal and state regulatory laws and regulations. The company is determined to implement the necessary procedures and takes actions aimed at fulfilling our role in the ongoing effort to reduce the prevalence of illegal robocalls and combat fraudulent traffic.

III. Know Your Customer Program

Voxology's *Know Your Customer* program was developed based on the premise that robocall mitigation requires a Know Your End-User program, not just a Know Your Customer program.

Voxology staff has met with all retail customers spending over \$1,000 per month, and has outlined its Know Your Customer / Know Your End-User program. This program involves developing mutual understanding of the use-case, and developing a strategy for the customer to manage end user KYC, and to make the information available to Voxology for audit purposes.

Voxology requires customers of its wholesale platform to be registered with the FCC's Intermediate Provider Registry and with the Robocall Mitigation Database.

IV. Contractual Provisions

Voxology's contracts and terms of service include strict limitations on the use of the platform to pass illegal calls. Customers are required to acknowledge existing regulatory and statutory frameworks and to comply with these regulations and statutes.

V. Telephone Number Validation

Voxology has implemented a series of processes for telephone number verification for new and existing customers. These include manual reviews as well as multiple web and API-based verification techniques designed to leave little doubt that Voxology's customer is in control of the telephone numbers they assert.

VI. Do Not Originate

Voxology applies both the industry Do Not Originate block list, as well as its own, proprietary DNO list to all calls, in an attempt to reduce the number of illegal calls on the PSTN. These lists are applied to both originated traffic as well as intermediate traffic.

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VII. Investigating Suspicious Calls

When Voxology identifies a suspicious call, either through its own efforts, or that of a third party, Voxology investigates the source of the call and attempts to validate its legitimacy. If the call is a wholesale call, Voxology blocks further calls when it is technically capable. If the call is a retail call, it will trip a KYC Red Flag investigation.

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

Voxology will continue to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and industry traceback consortium, and cooperate with such entities investigating and stopping any illegal robocallers that attempt to use its service to originate calls.

IX. Company-Wide Training

Voxology has performed training on its KYC and robocall mitigation standards. It trains all relevant roles on its KYC and robocall mitigation programs.

X. Industry Participation

Voxology is an active sponsor of, and participant in, the USTelecom Industry Traceback Group, as well as a member of its Steering Committee. Voxology actively supports an end to illegal calling, as well as the elimination of unwanted (albeit potentially legal) marketing calls.