

Q5 NETWORKS, LLC
Robocall Mitigation Plan
V.2 November 2023

STIR/SHAKEN IMPLEMENTATION

Q5 Networks, LLC (“Q5” or “Company”) is fully STIR/SHAKEN compliant and has implemented the Robocall Mitigation Plan described herein in accordance with the requirements of 47 C.F.R §64.305 and related orders of the Federal Communications Commission.

Q5 is an STI-GA authorized Service Provider registered with the Secure Telephone Identify Policy Administrator (STI-PA) and participates in the Signature-based Handling of Asserted Information Using toKENs (SHAKEN) ecosystem. The Company authenticates its customers following the Robocall Mitigation strategies described herein and based on that authentication, attaches the appropriate attestation level to its customers’ outgoing calls.

ROBOCALL MITIGATION

Background

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback:

The Company provides a general contact, **1-855-517-5005**, support@q5networks.com, in addition to three (3) technical staff members who have the capability to research any calls that traverse the Company’s network. The Company uses software which archives CDR data and contains the origination and termination information of each call. Q5 enforces multilevel authentication using IP, User Agent, Username and Password and archives all attempts to make telephone calls on the Company’s network. These archives can be used to provide information to the Industry Traceback Group.

Traceback Contact Information

Name	Title	Contact Information
Greg Sandruck	Service Manager	Ph: 410-517-5050 Email: gsandruck@q5networks.com
Richard Lowe	Service Coordinator	Ph: 410-517-5058 Email: rlowe@q5networks.com
Scott Kennard	Service Engineer	Ph: 410-517-5060 Email: skennard@q5networks.com

2. Take Steps to Mitigate Illegal Traffic

The Company has implemented firewalls with GEOIP functionality to enable blocking of entire country IPs if not required by its customers who are primarily located in the USA. Every customer contract specifically states that the Company's terms of service prohibit any illegal, fraudulent, improper or inappropriate calls. If the Company believes its voice services have been used for an unlawful or inappropriate purpose, the Company may immediately terminate the customer's service.

3. Measures to prevent origination of illegal calls

Know Your Customer:

The Company does not sell to wholesale subscribers. Q5 vets its retail customers by visiting the physical address of its customers. The Company only provides service to customers who sign a contract, provide a company name and federal tax ID. The Company establishes personal relationships with its customers through its sales process. This relationship with the customer helps the Company avoid enabling any illegal or inappropriate activities.

Telephone Number Validation:

The Company requires all end users who request to port numbers to Q5's network to provide a signed Letter of Authorization ("LOA") in addition to a copy of a telephone bill showing proof of ownership. The vast majority of Q5's customers are not authorized to change the published caller ID number on outbound calls. In the event that a number is published that is not assigned to Q5's network, the Company will sign these calls with a "B" or a partial attestation. In addition, all calls made on the Company's network are processed through another software that rates the calls and also purchases a Bad ANI report that will bring to our attention any user assigning telephone numbers not owned by the Company.

Call Blocking:

The Company will block traffic from any customer using telephone numbers that are not owned by the customer. If the Company receives complaints, the Company will investigate and terminate service if necessary.

4. Acceptable Use Policy

The Company has prepared an Acceptable Use Policy ("Policy") as a guide for its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our unlimited calling plans and features. This Policy is applicable to all our services and can be found at the following link: <https://www.q5networks.com/aup/>

CONCLUSION

The Company submits this Robocall Mitigation Plan, to comply with the requirements of 47 C.F.R §64.305 and related orders of the Federal Communications Commission. This plan is a work in progress and will be supplemented as the Company gains more exposure to and experience with these processes.