

## **Robocall Mitigation Plan**

New Age Consulting Service, Inc. ("NACS") doing business as infinIT and N2Net is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remained of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

## **STIR/SHAKEN**

We have implemented fully implemented STIR/SHAKEN as per the FCC requirements.

## **Know Your Customer**

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

## **International Subscribers**

NACS has a small number of international subscribers and subjects those calls to its STIR/SHAKEN implementation.

## **Terms of Service and Acceptable Use Policy**

NACS subscribers must accept our Terms of Service ("TOS") and Acceptable Use Policy ("AUP") before being permitted to use NACS's voice services. Among other things, these documents prohibit:

- Each Party shall comply with all applicable laws, rules, and regulations relating to its business operations.
- Customer is prohibited from using the Services or any Equipment used to access the Services for autodialing, continuous or extensive call forwarding, telemarketing (including, without limitation, charitable or political solicitation or polling), fax or voicemail broadcasting or fax or voicemail blasting.

## **Traceback Requests**

NACS is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Provider, and the industry traceback consortium. Furthermore, NACS is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use NACS's service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to [traceback@infinti.us](mailto:traceback@infinti.us) for immediate processing by NACS.

### **Telephone Number Validation**

Calls originated from our network that are required to be signed are validated as follows:

- Calls originating from a telephone number (TN) that we are providing to the customer as part of their voice service are signed with A-Level Attestation and an ID unique to the customer.
- • Calls originating from a telephone number (TN) that we do not provide to the customer as part of their voice service are signed with B-Level Attestation and an ID unique to the customer.

### **Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns**

NACS monitors calls to identify illegal robocalling.

#### **Examples of calling patterns monitored:**

- Abnormal Average Call Duration (ACD) distribution.
- Calls from invalid phone numbers.
- Customers reaching concurrent session limit.
- Recent call volumes (last 60 min) vs weekly trends.
- Number of unique destination numbers in a 60-minute time frame.
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution.
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends.