



Robocall Mitigation Plan

Jaintel LLC is an interconnected service provider, used and enjoyed by small business to enterprise customers. We have implemented a Fraud Detection AI system on our switch, which offers comprehensive reporting capabilities to aid in identifying suspected illegal robocalls. This system alerts us promptly if we ever originate calls with invalid or unallocated calling numbers. In such cases, we take immediate action to block these calls and initiate an investigation to determine if the caller is attempting to engage in unlawful robocalling activities.

If our investigation confirms that the caller was indeed attempting to originate unlawful robocalls, we take appropriate action. This may involve issuing a notice to the customer, instructing them to cease such actions, or, if necessary, terminating their service.

Rest assured, we are committed to maintaining the integrity of our network and preventing any illegal robocalling activities.

Traceback

We promptly respond to traceback requests from; the Commission, law enforcement and the traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers initiating calls.

Depending on the nature of the issue, Jaintel LLC aims to respond to traceback requests within a window of 4 to 24 hours. In the majority of cases, our response time is within 1 hour or less. However, we do have a maximum response time of 24 hours for any given circumstance.

Stir/Shaken

All the voice traffic that originates on our network is subject to our caller-id whitelisting process. Should a customer intend on using a caller-id not purchased from Jaintel LLC, said number must be verified before use. Calls with an unverified number will be dropped.

The majority of the voice traffic originating from our network is authenticated using STIR/SHAKEN protocols.

Mitigation

At Jaintel LLC, we consider the KYC (Know Your Customer) procedure to be of utmost importance. We require each client to complete the subsequent agreement and furnish supporting documentation from the list below:

- a. Master Service Agreement
- b. Legitimate traffic disclaimer form
- c. KYC Form

Supporting Document List:

Company Registration Certificate

Permanent Address Proof

Director Identity Proof (Passport)

FCC499A Filer ID

Last 12 months Trace Back Portal Data

In addition to KYC, we implement a Fraud Filter on Traffic Origination for every client trunk at Jaintel. We employ PeerEdge SBC from 46Labs Inc to ensure 100% accuracy in our filtering process, which includes:

- a. DNC (Do Not Call)
- b. DNO (Do Not Originate)
- c. ANI Filter
- d. DNIS Validation
- e. Wireless ANI Reject
- f. Neighborhood Spoofing
- g. 404
- h. Spam Caller ID using Youmail