

Innovative Communication Systems, Inc.

Robocall Mitigation Policy

1. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN and file a its Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of the companies listed above ("Innovative Communication Systems, Inc.).

Innovative Communication Systems, Inc. is partnering with a trusted provider to implement STIR/SHAKEN in parts of its network in which it may do so and has implemented this policy for those portions of its network not yet compliant.

II. The Company

a. Company Address & Contact Information

Address

City, State and Zip Code

Phone:

Website:

b. FRN and 499 Filer ID Numbers

Company FRN/CORES ID: 0023204159

Company 499Filer ID: 830037

Officers and Directors

CEO

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Regulatory Contact

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RMD/STIR/SHAKEN Contact

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III. STIR/SHAKEN IMPLEMENTATION

The Company will comply fully with all conditions set forth in the FCC's 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Pursuant to the exemption described in Paragraph 40 of *FCC 20-42 (WC Docket No. 17-97)*, we are a hosted VoIP provider that does not control the network infrastructure necessary to implement STIR/SHAKEN, nor do we have the ability to obtain an SPC token. Accordingly, we are exempt from the obligation to obtain our own STIR/SHAKEN certificate or perform call signing. Our upstream provider fulfills the STIR/SHAKEN authentication requirement on our behalf using its own certificate.

For purposes of the STIR/SHAKEN attestation, the Company's upstream provider has confirmed that their network treats ICS calls as reseller traffic, based on ICS' assertion that it is eligible for the STIR/SHAKEN exemption. Therefore, the upstream provider has authenticated the call as the originating provider using their SHAKEN certificate and has inserted a STIR/SHAKEN header into the SIP invite. The upstream provider then assigns either A or B attestation depending on whether the calling number is assigned to us in their number inventory.

IV. ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific measures that the ICS has implemented to detect and prevent illegal robocalls on its network as of June 30, 2023. The ICS will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the ICS determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment. ICS is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and ICS has not received information suggesting that robocalls are originated on its network. Therefore, ICS does not consider its network at high risk of originating illegal robocalls.

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V. General Prohibition Against Illegal Robocalling

Innovative Communication Systems, Inc.'s end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its Terms & Conditions ("T&C") requirements.

Its existing Terms & Conditions prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Innovative Communication Systems, Inc.'s service to engage in or in connection with fraudulent activities

In addition, the company is updating its Terms & Conditions to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated Terms & Conditions.

Innovative Communication Systems, Inc.'s end users are notified that Innovative Communication Systems, Inc. may take action up to suspension or termination of service for violation of the Terms & Conditions.

V. Company Know Your Customer ("KYC") Standards

As related to Know Your Customer ("KYC"), the Company has a rigorous customer-onboarding process, the Company undertakes very stringent and various commercially reasonable precautions to verify a given customer's identity, including having its customers complete:

- a. Intake and Onboarding Documents
- b. A formal written contract/Master Service Agreement
- c. Service Orders
- d. Company FEIN Number

Among other data points collected and, as appropriate, verified, as part of those processes the Company gathers the following customer-identifying facts and circumstances:

- a. Customer business name,
- b. State or country of incorporation,
- c. Physical business location,
- d. Business/Trade and bank references,
- e. Credit Application,
- f. Contact person(s), and
- g. Federal tax ID number

The Company also uses best and reasonable efforts to confirm the identity of new commercial voice customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and understanding the nature of the customer's business including if/how they will employ auto-dialers or other robocall style tools in the conduct of their business.

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Innovative Communication Systems, Inc. is a small, long-established provider that maintains a close relationship with its subscribers. Its customers are generally local small business customers and does not resell services to other resellers.

Innovative Communication Systems, Inc. utilizes the mitigation technique of Know Your Customer ("KYC"). A very few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Innovative Communication Systems, Inc. has set an acceptable usage level based on its average customer size when working with its upstream providers.

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential.
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business along with other critical information.
- An Innovative Communication Systems, Inc. representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling.

VI. Traceback and Enforcement Cooperation

Innovative Communication Systems, Inc. will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group to investigate and stop illegal robocalls. Innovative Communication Systems, Inc. will dedicate sufficient resources to provide prompt and complete responses to traceback requests within 24 hours or less.

VII. Company Declaration

The Company is not currently subject to a formal Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing, nor has it been so in the past two years.

The Company has the right to update, modify and/or change this plan at any time which such changes made by the Company designated individual; when, and as the Company business model may change. Company shall immediately upload the new plan to the RMD.