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ROBOCALL MITIGATION PLAN

1. Net253, LLC is a small service provider serving fewer than 500 voice subscribers.
2. Net253, LLC commits to respond to all trace back requests from the Commission, law enforcement and the industry traceback consortium. Net253 will cooperate on a timely basis with such entities to investigate and stop any illegal robocallers that use our network to originate calls. If one of Net253's customers determines that their number has been spoofed and reports it to our staff, Net253 will initiate a traceback request with the industry traceback consortium.
3. Net253 has taken the following steps to detect and avoid originating illegal robocalling traffic on our network as part of our Robocall Mitigation Program.
 - a. Net253 will use call reporting records provided by Vitelity, our wholesale SIP provider, our outbound SIP traffic. Net253 performs no TDM voice traffic.
 - b. Net253 has a channel capacity limit of 32 concurrent calls. Net253 services are incapable of generating significant call volume.
 - c. If a new or existing customer orders more than two service lines, they will be contacted to determine the intended use of the service. If it is determined that the services will be used for illegal robocalls, we will refuse to initiate the services.
 - d. Per 64.1200(n)(5) our upstream is Vitelity/Onvoy/Inteliquint/Sinch. We have personal communications and email with their voice network engineers on a monthly basis.
 - e. We monitor our daily peak outgoing call volume. Any day we peak above 16 simultaneous calls, we check to ensure they are not from a single subscriber.
 - f. We offer land line replacement devices, AKA analog Telephone adapters. No customer is provided with SIP credentials which are required to utilize high rate robo calling.
 - g. Our place in the call chain is the home analog phone adapter.
 - h. It is technically impossible for a Net253 customer to perform robo calling automation/volume.