

Zefiro Networks LLC Robocall Mitigation Policy

July 27th 2021

As part of the industry wide effort to combat abuse of the public telephony network (PSTN) our company intends to conduct the following actions aiming to prevent unauthorized originated by our customers to residential and cellular phone lines performed with automated telephony dialing systems through our telephony network

While our company is working towards having an end to end STIR-SHAKEN implementation as mandated by the applicable regulations we have outlined the following steps to mitigate any unauthorized automated dialing.

- **Prevent Caller ID spoofing (TICIDA),**
we will reject any call from where the caller id is not associated to the customers account
- **Prevent Calls to numbers in the do not call list**
we will work with our customers to ensure that their call traffic is screened against the **Do not call registry** when the calling party does not have a preexisting commercial relationship with the called party
- **Prevent Automated** calls when they are made without the express permission from the recipient including:
 - Artificial voice calls that do not include the telephone number or address, or identification of the caller in the announcement
 - Telemarketing calls that do not include an automated do-not-call option
 - Telemarketing messages left in voice-mail that do not include a toll-free call-back number that connects directly to an automated opt-out mechanism.
- **Know Your Customer**
As part of our business we confirm the identity of new commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of customer's business
- **Monitor Voice Traffic**
We analyze high-volume voice network traffic to identify and monitor patterns consistent with robocalls including: high call volumes, low duration calls, sequential dialing patterns, and call volumes to telephone numbers on the FTC's Do Not Call list



JAIME RENE MENDOZA AGUILAR
MANAGER OWNER
ZEFIRO NETWORKS LLC