



**BizVox
Communications**

Complete Business Communications

Robocall Mitigation Plan for BizVox Communications

1. BizVox Communications Is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines. We have STIR SHAKEN with Transnexus handling our STI-PA implementation as of June 20 2022.
2. We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list. We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.
3. BizVox Communications commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
4. BizVox Communications commits to update any information within 10 business days of any material change.
5. BizVox Communications has taken the following specific steps to detect originating robocall traffic:
 - a. BizVox maintains call detail records to determine typical call volume and potential reasons for significant deviations from the typical call volume. BizVox will determine if there are legitimate reasons for any customer to be making a number of high volume, short duration calls. BizVox will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.
 - b. BizVox will vet customers through normal business practices and will obtain billing address, primary residence, or business location and the nature of the customer's business.
 - c. Bandwidth provides long distance services for BizVox.
 - I. Bandwidth has adopted rules requiring service providers to deploy a STIR/SHAKEN solution by June 30, 2021. Bandwidth has network elements in place to filter the incoming and outgoing calls to mitigate robocalls of BizVox network.

- d. Establishing a single Point of Contact (along with backups) for our robocall mitigation program.
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- 6. BizVox Communications has taken the following steps to prevent illegal originating robocalling traffic utilizing the “Know Your Customer” policy.
 - a. Full customer attestation
 - b. VOIP connections are based on Caller ID Authentication and “Allow Specific, Deny All” control list policy
 - c. Customers are SMB’s only and have disclosed full contact information
 - d. All customers must be onboarded by a BizVox team member to vet the customer including business operations type, address and owner information.
 - e. No auto-onboarding is allowed for a customer.
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- 7. BizVox Communications has taken the following steps to mitigate illegal originating robocalling traffic upon detection:
 - a. Notify customer of detection of possible illegal activity.
 - b. Require customer to cease any illegal activity.
 - c. Terminate customer long distance service if customer does not cease illegal activity.
 - d. BizVox will implement other FCC required rules once they are defined.