

Robocall Mitigation Program

June 2021

Storacall Technology Ltd trading as X-on, is a voice service provider with fewer than 100,000 voice service subscriber lines all of which are business fixed subscriber lines. As a small voice service provider with SIP services in its network, we believe we are temporarily exempt from fully implementing the STIR/SHAKEN call authentication framework under §64.6301 until June 30, 2023. However the company has in the interim, implemented this Robocall Mitigation Program.

Storacall Technology Ltd is an ISO 27001:2013 certified company and takes regulatory compliance very seriously, and as such is committed to preventing robocalling through it's Robocall Mitigation Program. The Program mitigates the risk from such calls made with an auto-dialer or that contain a message made with a prerecorded or artificial voice.

Storacall Technology Ltd is a reseller of lines provided by Voxbone and British Telecom. All outbound international traffic is carried on the Gamma Telecoms Ltd network.

To avoid originating illegal robocall traffic Storacall Technology Ltd is taking the following steps in the robocall mitigation program

Direct business customers who have placed orders undergo due diligence checks of the following data

- Company Name
- Company Registered number
- Registered address
- Contact Name
- Landline number
- Credit rating and County Court Judgements through Experian Business Express and their rating

continues to be monitored while they remain a customer.

Customers are contacted directly and sign a contract with the conditions of the use of the service defined and excluding illegal use of the services. All customer contractual data is held and managed through the CRM tool Autotask.

Any reseller orders will be tested before release to ensure that the service is genuine and valid.

Storacall Technology Ltd systems do not have any functions built in that would enable our customers to do robocalling.

Storacall Technology Ltd works with our carrier partners to identify and restrict robocall traffic and have a rapid response process for any complaints or reports received through a security incident reporting process. All incidents are investigated under the X-on Information Security Policy.

Our outbound call partner Gamma uses fraud management applications including SIP Trunk Call Manager that aims to identify unusual voice traffic patterns quickly with a 24/7 operational capability to then assess and mitigate the risk.

All applications have means by which service can be denied, suspended or terminated.

Storacall Technology Ltd are committed to respond to requests from the Industry Traceback Group to trace suspect calls for mitigation efforts.

Storacall Technology Ltd fully cooperates in investigating and stopping any illegal robocallers whether under UK law to comply with section 66(1) of the Investigatory Powers Act 2016 it is the duty of a telecommunications operator or non-UK equivalent regulations.

All call data records held to meet regulatory constraints and those that are stored to data retention policy limits can be made available to assist investigations.