

ROBOCALL MITIGATION PROGRAM

Company:	Fenestrae B.V. Doing business as "Fenestrae"
Solutions names:	Fenestrae SDX (Secure Document Exchange) Faxination SaaS (Software as a Service) Fenestrae SaaS (Software as a Service)
Version:	1.0 (August-2021)
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Background

Fenestrae is a fax service provider with global coverage. For our customers we are able to migrate and/or forward global DID (Direct Inward Dialing) numbers to our fax platform. The platform process both inbound and outbound fax traffic.

Fenestrae does not process voice traffic but it's connected to voice and/or SIP platforms which handles both voice and fax traffic. Since SIP providers cannot always distinct voice from fax transmissions we are required by them to register at the FCC Robocall Mitigation Database.

Steps Taken to Avoid Originating Illegal Robocall Traffic

- 1) Know your Customer:** all of our end users are known, identified and under contract restricting them of illegal traffic. It is not possible to create accounts without human interactions and without identification.
- 2) Monitoring:** all traffic is live monitored and staff is trained to discover automated robotic traffic.
- 3) 24x7 response:** we have a 24x7 support team in place which will respond within 8 business hours to any notification of illegal activities. They can and will also take direct action and terminate and stop any illegal robocallers.
- 4) Traceback and Enforcement Cooperation:** we will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. We will dedicate sufficient resources to provide prompt and complete responses to traceback requests.