



SQUARETALK

Robocall Mitigation Plan

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1. Company Business Information

- **Legal Name:** Squaretalk Ltd 514417922
- **Business Name (DBA):** SQUARETALK
- **Address:** Tseret 15, Jerusalem, Israel

2. Contact Information for Robocall Mitigation-related Issues

- **Full Name:** Tsvetomira Nakova
- **Title:** Carrier Relations Manager
- **Department:** Carrier
- **Business Address:** g.k. Lozenets, Blvd. "Cherni Vrah" 25, 1421 Sofia, Bulgaria
- **Telephone Number:** +1 212 203 0066
- **Email Address:** carrier@squaretalk.com

3. About SQUARETALK

Founded in 2010, SQUARETALK operates out of Jerusalem, Israel, and Sofia, Bulgaria, as a VoIP provider. While most of its customers are based in Europe, the company offers services in over 100 countries. Its diverse customer base includes residential users, small-to-medium businesses, and resellers. SQUARETALK is a trailblazer in combating illegitimate traffic, such as robocalls, and actively educates customers on the importance of secure communication. The company continuously invests in enhancing its network and security protocols to prevent unauthorized traffic across its infrastructure.

SQUARETALK has previously secured trademarks in the United States, Europe, and other regions. Notably, it has not been barred from filing in the Robocall Mitigation Database due to any enforcement actions, nor is it under investigation by any regulatory

or law enforcement agency for unlawful robocalling or spoofing activities.

Commitment to Security and Compliance

SQUARETALK takes a proactive approach to its customer vetting process. The platform allows users to self-register, but they must complete a "Know Your Customer" (KYC) verification. This involves submitting detailed information such as company name, physical address, phone number, email, and contact person. For businesses and resellers, additional information—like the number of employees or DID numbers—is required. This data is securely stored to comply with legal and security requirements. During sign-up, users must agree to SQUARETALK's Terms of Service and Privacy Policy. Any violation, including the processing of illegal traffic, can result in immediate account suspension or termination at SQUARETALK's discretion.

All new accounts undergo security checks before activation. If any risks are identified, users may be asked to provide proof of identity, such as government-issued ID matching their registration details. SQUARETALK employs sophisticated algorithms and collaborates with third-party vendors to strengthen these security measures. Customers from high-risk regions are subject to additional scrutiny based on observed trends and insights from upstream providers.

Once onboarded, customers are monitored through SQUARETALK's fraud detection systems. These systems utilize real-time alerts and notifications, ensuring continuous oversight, especially for new accounts. Measures such as limited outbound calling paths are applied to mitigate risks.

CallerID Verification and Fraud Prevention

SQUARETALK requires all outgoing calls to pass a valid CallerID format configured within the platform. As of March 31, 2023, SQUARETALK introduced CallerID verification through a third-party service. This process involves verifying users via SMS or phone calls to confirm ownership of their numbers. Customers using unverified CallerIDs must complete this process before making

outbound calls.

In collaboration with upstream carriers, SQUARETALK leverages "Do Not Originate" (DNO) lists from providers like Somos and Neustar. These measures, combined with adherence to FCC's STIR/SHAKEN protocols, ensure compliance with robocall mitigation regulations. SQUARETALK also actively blocks suspicious activities such as unusual call spikes, low completion rates, or systematic calling. A dedicated team investigates flagged accounts and takes immediate action to prevent abuse.

Cooperation with Law Enforcement

SQUARETALK maintains a zero-tolerance policy for fraud, scams, and robocalls. The company regularly reviews call logs and analytics to detect potential misuse. In cases of suspected illegal activity, SQUARETALK works closely with upstream providers and law enforcement agencies. A designated contact point (carrier@squaretalk.com) ensures efficient handling of legal requests. Law enforcement agencies can provide necessary details such as subpoena or court order copies to expedite investigations.

SQUARETALK fully complies with the FCC's requirements for robocall mitigation. Its comprehensive plan is designed to significantly reduce illegitimate traffic and is updated as needed. Any material changes are promptly communicated to employees, contractors, and regulatory bodies within the mandated timeline.

By prioritizing compliance, security, and customer education, SQUARETALK remains a trusted provider committed to maintaining integrity in global communications.

4. Know Your Customer (KYC) and Onboarding Process

- **Verification Requirements:** Customers must provide detailed information, including legal name, address, phone number, email, and contact person. For businesses and resellers, additional details like the number of employees and DIDs owned are required.
- **Trust-Based Access:** New accounts have limited access, including restricted channel capacities, international dialing, and phone number purchasing. These restrictions are reviewed and adjusted over time based on customer compliance and behavior.
- **Security Screening:** Accounts are activated only after passing SQUARETALK's proprietary security software. High-risk accounts may undergo further scrutiny, including ID verification.
- **Terms of Service:** Customers must accept the Terms of Service, allowing SQUARETALK to suspend or terminate accounts for violations, including illegal traffic.

5. Proactive Monitoring and Tools

SQUARETALK employs advanced tools for real-time monitoring of network traffic, including:

- **Protocols Supported:** SIP, RTP, RTCP, SCCP (SKINNY), MGCP, SS7, SCTP, WebRTC, TCP, SSL, TLS.
- **Real-Time Alerts:** Identifying anomalies such as spikes in call volumes, unusual call patterns, or low completion rates.
- **Do Not Originate (DNO) Lists:** Incorporating third-party DNO lists and maintaining internal lists.
- **Honeypots:** Blocking malicious SIP traffic with proprietary and third-party honeypots.

6. Investigative Procedures

- **Verification:** Confirm ownership or authorization of caller IDs.
- **Capacity Limitation:** Reduce access for customers under investigation.
- **Suspension:** Block services for customers identified as sources of illegitimate traffic.
- **Traceback Participation:** Respond to Industry Traceback Group (ITG) requests within 24 hours.

7. Swift Mitigation Measures

- **Immediate Actions:** Block traffic flagged as suspicious and notify customers.
- **Collaboration with Providers:** Work with upstream providers to maintain compliance with STIR/SHAKEN standards.
- **Zero Tolerance:** Terminate accounts involved in fraudulent or illegal activities.

8. Internal Education and Traceback Response

- **Dedicated Team:** SQUARETALK's Law Enforcement team responds to traceback requests within 24 hours.
- **Empowered Members:** Team members are equipped with tools and authority to act promptly.
- **Education Programs:** Continuous training for staff to handle traceback and law enforcement requests effectively.

9. STIR/SHAKEN Certification

SQUARETALK has implemented STIR/SHAKEN across its IP network to ensure accurate caller ID authentication, combating spoofing and illegal robocalls.

10. Brand Protection

- **Monitoring Tools:** Advanced algorithms detect numbers flagged as spam.

- **Customer Notifications:** Prompt alerts to clients for corrective actions to protect their businesses and reputation.

11. Commitment to Ongoing Compliance

SQUARETALK commits to:

- Regularly updating its Robocall Mitigation Plan.
- Filing material changes with the FCC within ten (10) days.
- Maintaining dynamic processes to address new threats.

12. Point of Contact for Law Enforcement Requests

Law enforcement agencies can direct requests to:

- **Email:** carrier@squaretalk.com
- **Required Information:**
 - Full name, authorized agency/department, and phone number.
 - Target telephone numbers and relevant dates.
 - Legal documentation (e.g., subpoena, court order).
 - Specific circumstances or deadlines.

Requests are treated with priority and processed within 24 hours.