



Robocall Mitigation Plan

We are a reseller of Telnyx, LLC (RMD0001645) Hosted VoIP and do not have the capability to implement STIR/SHAKEN. Our partner providers have implemented STIR/SHAKEN protocols in their IP Voice networks.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

PointVoIP, LLC, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

We rely on software provided by Telnyx to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

PointVoIP takes the following actions to prevent robocalls from originating on our network.

- PointVoIP offers multiple service offerings that allow originating traffic:
 - Hosted Voice
 - SIP Trunking
 - On-Premise PRI
 - Call Forwarding
 - Virtual Fax

The following are actions taken on all service offerings:

- Business Verification
- Owner Name, Address, and Phone Number, Email
- Business Physical Address
- EIN
- Industry
- Description of product/services provided

- Call Per Second (CPS) Limits
- Number Source List - Allows customers to call out from their verified and owned numbers only.
- Call Detail Records (CDRs) are kept for five years.
- IP based firewall is in place to allow inbound and outbound signaling from authorized peers only.
- The PointVoIP service agreement strictly prohibits caller ID spoofing, any customer attempting to engage in caller ID spoofing is suspended and investigated.

The following additional actions have been taken on our Hosted Voice offering:

- STIR/SHAKEN authentication on originating traffic and verification on terminating traffic.
- Robo-call pattern recognition monitoring
- Unusual call pattern monitoring
- Anti-hacking services on each hosted voice instance.