

ROBOCALL MITIGATION PLAN

To:
Federal Communications Commission
Washington, DC 20554
USA

From:
IPFINITY Inc.
Network Department
238 Main St. South
Rockwood, ON
NOB 2K0
Canada

Statement

1 **Definitions**

RMP: FCC's Robocall Mitigation Plan
RMD: FCC's Robocall Mitigation Database
CRTC: Canadian Radio-television and Communications Commission
ACT: Canadian Telecommunications Act

2

IPFINITY is a registered telecommunications provider with the CRTC as under the ACT and a foreign voice services provider under the RMD.

3

With respect to the RMP, IPFINITY is an "over-the-top" carrier, meaning that it originates and terminates calls from and to the United States via other, intermediate carriers, aka transit partners.

4

IPFINITY is committed to mitigating robocalls originating within our network by actively tracing every complaint to its source and applying suitable mitigation. IPFINITY is able to identify all calls originating with its own network to the source.

5

Robocall mitigation plan pursuant to FCC 20-136, para. 78

(a) IPFINITY provides telecom services exclusively to business, government and not-for-profit organizations — specifically we do not cater to individuals. In every case, we are in possession of each organization's particulars which are verified before providing service. (b) We decline termination traffic that carries caller id information that does not match the calling entity's name and number — which complies with CRTC 2018-484 Implementation of universal network-level blocking of calls with blatantly illegitimate caller identification. (c) We allow outgoing caller ID to be blocked by customers; however, in such cases we convey, via SIP header, calling party information to upstream carriers (provided we have an undertaking of respect of privacy from the latter) to enable the latter to perform robocall mitigation. (d) We monitor all robocall complaints and, if originating within our network, are able to identify the source and take mitigating action.

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