



## Robocall Mitigation Strategy

### Know Your Customer

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

### Traceback

We respond 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 or fraudulent callers that attempt to use our service to originate calls.

### STIR/SHAKEN Extensions

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR §64.6304 because we have fewer than 100,000 voice subscriber lines.

### Programmatic Limitation/Mitigation & Process Driven Call Pattern Auditing

All voice traffic that originates on our network is subject to our Robocall Mitigation efforts as described below. Our subscribers are further protected by the ability to enable call blocklists to prevent calls from any number they choose to block.

1. All numbers utilized on our network and calls to and from our platform are routed via/ported to Tier 1 providers who are STIR/SHAKEN compliant and implement effective robocall mitigation strategies/policies.
2. Limitation of the number of concurrent calls originating from a subscriber's account.
3. Ensuring that numbers configured as Caller-ID for a subscriber line belongs to subscriber's account.
4. Regular or automated monitoring and review of subscriber traffic patterns to identify calls consistent with robocalling and short duration calls of an annoying or potentially fraudulent nature. In addition, and as dictated by our Terms of Service Agreement:
  - a. Any subscriber found to be exceeding 10% short duration calls (<60 secs) as a ratio of total calls originated in a 12-hour period is notified and subject to immediate account suspension.
  - b. Any subscriber suspected of fraudulent calls or who triggers an alert for robocalling-like traffic patterns must submit satisfactory and verifiable explanation to our Customer Support upon being notified. Robocalling devices/software are strictly prohibited, any subscriber using such a system is suspended/terminated.
  - c. Any subscriber who generates a carrier or FCC complaint is notified and immediately suspended from originating calls via our platform until a thorough investigation is completed. If the subscriber cannot provide satisfactory proof that calls are of a non-fraudulent nature or are found to be utilizing any robocalling device or software their account is subject to immediate and unconditional termination.

### **Periodic RMS Updates**

We update our Robo-call Mitigation Strategy periodically to ensure any potential concerns are dealt with promptly.