

## **Advanced Voice Tech -- Robocall Mitigation Plan**

Advanced Voice Tech (hereafter "AVT") submits this Robocall Mitigation Plan to the Federal Communications Commission("FCC"). AVT complies with efforts to avoid originating illegal robocalls, demonstrate a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls.

### **Know Your Customer**

The accurate identification of a customer is tied to a telephone number based caller identity associated with that customer OR via their originating switch ip address that is unique to them. AVT requires a signed contract with customer. AVT confirms a customer's identity by vetting a customer directly. (Physical location, contact info, etc.)

### **Traceback**

AVT will respond to all traceback requests from the Commission, and the registered traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. Call Detail Records(CDRs) are created for all calls and stored in a searchable database, and include all data such as ANI, originating IP address, timestamps, etc. and stored for 6 months.

AVT makes use of tracking originating media ip's in correlations with outpulsed ANI so we can easily determine who is sending what ANI's even though such ANI may not be legitimate and authorized for their use. This allows us to get the true identify of an abuser.

### **Robocall Mitigation Program**

AVT is implementing a robocall mitigation program described below, requiring all voice traffic that originates on our network be subject to these stringent standards. AVT monitors outbound voice traffic in real time to identify and mitigate any irregular traffic patterns to reduce fraudulent and/or illegal robocall traffic. When AVT identifies potential fraudulent, abusive, suspicious, or robo-calling traffic patterns; it acts swiftly to mitigate this activity.

- (1) Blocking or rejecting known fraudulent/abusive traffic or invalid calling numbers
- (2) Blacklisting a known abusive number
- (3) Tracing the call traffic back to the originating party
- (4) Reporting instances of irregular traffic activity to our carrier customer
- (5) Requiring the customer to remediate and detail the cause of said irregular traffic
- (6) Taking action such as suspension or termination for violations.