

Luna Tech LLC
DBA Luna VoIP

Robocall Mitigation Plan

1. Introduction

Company Overview:

Luna VoIP is a VoIP provider that specializes in VoIP for small businesses. Luna VoIP uses Bandwidth for outbound calls, origination calls, and houses our client telephone numbers.

Purpose of the Plan:

This document is to explain how our calls are routed and the mitigation steps we have in place to prevent robocalling and bad call traffic.

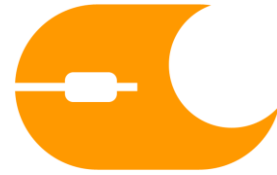
2. Measures to Prevent Customers from Originating Illegal Robocalls

Policy Enforcement:

Our customers are not able to make calls out from our network that do not have a valid caller-id. This caller ID has to be owned by us for a user to place an outbound call. This is to prevent number spoofing.

Customer Vetting:

Customers are onboarded to Luna VoIP by a physical walkthrough of the business to make sure they are a good fit for our company. We also install all of our customers' phones and services on site. We are a region-specific company and all of our customers are local to us.



Monitoring and Compliance:

We have rules in place that prevent calling from our phones with numbers that are not in our inventory. Users are not able to spoof numbers. They are only allowed to show the numbers that they have in service with us. No other numbers can be used. We have concurrent call limits in place to prevent mass dialing from our services. Users are not able to dial out of country unless they place a support ticket with us to enable international calling.

3. Know-Your-Upstream-Provider Program

- Provider Verification:

Bandwidth has ensured us that their STIR/SHAKEN and Know-Your-Upstream-Provider practices are in place. We have obtained a certification from Bandwidth that they have placed on our account to sign calls. We also see on many calls from them to us that when a call does not pass verification or it is a “robocall” they label it as such and notify us.

4. Compliance and Reporting

We have reporting and alerts in place on our platforms that will notify us of unexpected high call volume as well as high short call duration and multiple call hangups by the called party. Our clients’ simultaneous call channels is limited to the number of their users. Thereby limiting simultaneous call behavior.

5. Conclusion

Luna VoIP will continue to do whatever necessary to be in compliance with the FCC’s Robocall Mitigation Plan.