

## **Robocall Mitigation Plan**

### **COLI Inc. (FRN: 0017146051)**

COLI Inc. is a small voice service provider (VSP) that purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290). We are dedicated to stopping illegal calls from originating on or transiting our network and monitoring calls coming into our network.

COLI Inc. serves as a Voice Service Provider without a STIR/SHAKEN implementation obligation (reseller/white-label model relying on upstream wholesale partners).

The FCC requires all voice service providers to maintain a robocall mitigation program that includes specific, reasonable steps to avoid originating or transmitting illegal robocall traffic, a commitment to respond to traceback requests, and cooperation with investigations. This plan describes COLI Inc.'s program.

#### **STIR/SHAKEN Status**

We are eligible for and rely on the small-provider extension under 47 CFR § 64.6304 (fewer than 100,000 voice subscriber lines). All voice traffic that originates or is processed on our network is subject to the robocall mitigation program described below. Our upstream provider Atheral LLC has fully implemented STIR/SHAKEN.

#### **Know Your Customer (KYC) Procedures**

COLI Inc. follows and exceeds the best practices for vetting caller identity and subscribers recommended by the NANC Call Authentication Trust Anchor Working Group.

Before provisioning service to any new or renewing customer (retail or wholesale/reseller), we collect and verify the following core identity information:

- Full legal name of the individual or business
- Physical street address (no P.O. boxes)
- Government-issued identification (for individuals) or business registration documents, federal tax ID / EIN (for businesses)
- Contact phone number(s) and email address
- Nature of the customer's business or intended use of the service

We verify this information using third-party tools (credit/reference checks, address validation, and public records) and retain records for the duration of the customer relationship plus four years after termination. High-volume or higher-risk customers receive additional scrutiny, including review of intended call types and sample traffic patterns.

We prohibit service to any customer we cannot adequately verify and immediately investigate or terminate any customer whose traffic triggers our monitoring systems.

#### **Know Your Upstream Provider (KYUP)**

We maintain a contractual relationship only with Atheral LLC. Prior to onboarding or renewing any upstream relationship, we:

- Confirm the upstream provider has a current, complete filing in the FCC Robocall Mitigation Database.
- Review their robocall mitigation plan and STIR/SHAKEN implementation status.
- Obtain written confirmation of their compliance with KYC, traceback, and robocall mitigation obligations.
- Monitor their performance through traffic analytics and periodic due-diligence reviews.

We will not accept traffic from any upstream provider that fails these checks.

### **International Subscribers**

COLI Inc. does not sell origination or termination services to subscribers outside the United States.

### **Acceptable Use Policy (AUP)**

COLI Inc. maintains a signed Acceptable Use Policy that all subscribers must agree to before using our services. The AUP explicitly prohibits:

- Originating or transmitting illegal robocalls, spoofed calls, or any traffic that violates federal or state telemarketing, truth-in-caller-ID, or do-not-call laws.
- Fraudulent, deceptive, or unlawful activities.
- Traffic pumping, wangiri, or any artificial inflation of call volume.
- Use of the service in any manner that would violate FCC rules or enable illegal robocalls.

Violation of the AUP results in immediate investigation and potential termination of service.

### **Traceback Requests**

COLI Inc. is committed to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC and the industry traceback consortium. We cooperate fully with any investigation and take immediate action to stop illegal robocallers using our services. Subscribers are required to comply with traceback requests via our AUP.

Traceback requests can be sent to [robocall@coliinc.com](mailto:robocall@coliinc.com) for immediate processing.

### **Telephone Number Validation**

If a subscriber wishes to use a telephone number (TN) as caller ID that is not directly managed by COLI Inc. or our wholesale partners, the subscriber must provide a valid Letter of Authorization (LOA) or other sufficient documentation proving they are the authorized user of that TN. We forward this documentation to Atheral LLC so they can properly attest the calls.

### **Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns**

Our wholesale provider Atheral uses TransNexus ClearIP (and equivalent real-time analytics) to monitor all origination voice traffic in real time. The system identifies and alerts on calls where the calling number is invalid, unallocated, on a Do-Not-Originate list, listed in the FCC consumer complaint database, or has a poor reputation.

Atheral notifies COLI Inc. of any suspected unlawful robocalls. We investigate promptly and either warn the customer or terminate service based on our AUP.

### **Examples of monitored calling patterns include:**

- Higher-than-expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number (15-minute window)
- Fast/slow traffic pumping to specific geographic locations (5–60 minute windows)
- Theft-of-service pumping to high-cost locations
- Recent call volumes vs. weekly trends
- Number of unique destination numbers in a 60-minute period
- Irregularities in Short Call Duration (SDC), Average Call Duration (ACD), and Answer-Seizure Ratio (ASR)
- High-volume outbound or excessive inbound calls from the same number
- Wangiri triggers to high-termination-rate

### **Material Change Update Commitment**

COLI Inc. commits to updating this Robocall Mitigation Plan and all related information in the Robocall Mitigation Database and CORES within 10 business days of any material change (including but not limited to changes in ownership, contact information, upstream providers, mitigation procedures, or business operations). Failure to do so may result in enforcement action.

#### **Annual Recertification**

We will annually review and recertify this filing by the required March 1 deadline.

This plan constitutes the specific, reasonable steps COLI Inc. takes to prevent illegal robocalls. We will continue to refine these measures as technology and FCC guidance evolve.

#### **Contact for Robocall Mitigation Issues**

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