

Nerdphone



Expanded robocall mitigation plan - TRACED ACT and STIR/SHAKEN compliance.

Certification:

Nerdphone only allows outgoing calls (termination) that comply with their TOS tracking the FCC's mandates regarding Robocall Mitigation. Caller ID, call duration, repeated calls are all closely monitored to ensure that we are inline with the FCC's Robocall mitigation guidelines. Nerdphone has been working to be able to directly sign all calls but has relied on upstream outbound providers until this point. Nerdphone is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

Parent companies:

Nerdphone and Nerdphone.net is a DBA for NiceMojo Technologies, LLC a Colorado limited liability company in good standing which is wholly owned by Mile High PC Solutions, LLC and All Technologies Unlimited, Inc both also Colorado, US based companies in good standing. NiceMojo Technologies has two principals that exercise management and / or control.

Principal 1:

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Principal 2:

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Acceptable use:

Nerdphone's TOS (Terms of Service), does not permit ANY type of outbound automated dialing (robocalling) from our infrastructure. All outbound calls (B-leg) are initiated only after a live answer on an authenticated and authorized end user endpoint device(A-leg) . Device agent type is screened and verified to prevent automated calling devices. High volume, short duration, repeated number calls or other abnormal activity is immediately addressed, customers attempting such calls will have their outbound services immediately suspended pending Nerdphone staff review.

Upstream Providers:

Nerdphone only uses upstream termination providers that are STIR/SHAKEN compliant. Signing of outbound calls has been handled at that layer by outsourcing to the applicable carrier up to this point. Work is currently in process to be able to sign all calls prior to our termination hand off.

"Know Your Customer" mitigation techniques:

- Nerdphone only directly services known or referenced US based businesses entities (our end users) we do not have any type of reseller or wholesale programs.
- Nerdphone only services US based customers all foreign entities are declined service.
- Nerdphone does not accept customers through any type of online or API only process.
- Nerdphone's new customers are referenced from known partners or by reputation or referral.
- Nerdphone's new customers are all verbally vetted by our staff and required to provide physical business address, billing address, email, alternative contact of at least one responsible party information as well as US only payment information, via credit card or US bank transfer.

CDR Monitoring / Call Duration:

Nerdphone uses many dynamic techniques and in house developed services to monitor for high volume, short duration and / or unknown Caller ID number calls from our accounts on a daily basis , abnormal activity is immediately addressed upon detection and customers attempting such calls will have their services suspended immediately, pending further Nerdphone staff review.

Nerdphone has a strict 2 concurrent call per device limit on all endpoints. Only authorized devices / end points are allowed, all outbound calls will be initiated by live person and call path is only to that endpoint.

To our knowledge no commercial third party vendors are in use monitoring or analyzing Nerdphone's out bound traffic. Upstream providers likely do have such processes in place but we are not supplied any information except in case of improper traffic they report.

Outbound Caller ID protections:

- All outbound calls from Nerdphone's network are placed only with the CallerID of record for that account or another documented and vetted number that is attached to the account. Caller ID spoofing is not allowed and users are not provided a method to alter Caller ID for outbound calls. Any attempt to usurp this measure will result in outbound services immediately suspended pending Nerdphone staff review.
- Forwarded calls with the original Caller-ID are only allowed to known targets that has agreed to take the customers calls.

Traceback Requests:

Nerdphone understands the requirement to respond to and cooperate with any and all traceback requests from the FCC (Federal Communications Commission) and law enforcement agencies to investigate and stop any illegal reported “robocallers” from using Nerdphone’s infrastructure to place said calls in a prompt and timely manor. Nerdphone understands that all voice traffic that originates on its network is subject to this robocall mitigation program.

Implementation Deadline:

Nerdphone is a small voice service provider with far less than 10,000 subscribers, given Nerdphone’s status as a small provider.