

Numeric Futures Limited **Robocall Mitigation**

Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN.

This mitigation plan is submitted on behalf of Numeric Futures Limited, a Foreign Voice Service Provider. Numeric Futures is a telecommunications company based in the United Kingdom.

We operate as a communication provider/reseller both directly to end users and via a partner framework. Our services are provisioned from upstream providers and routed through our network for connectivity.

We specialise in providing inbound numbering for companies who require inbound services (provision of our inbound service may also include termination of these inbound calls).

We are actively working to support the STIR/SHAKEN framework requirements to identify and prevent illegal robocalling on our networks.

Numeric Futures has chosen to employ a multi-layered approach to address and mitigate illegal robocalling and comply with industry call trace-back efforts. Company efforts will include the following:-

- General prohibition against illegal robocalling
- Know Your Customer
- Know your Upstream Providers
- Network Monitoring
- Traceback and Enforcement Cooperation

General Prohibition Against Illegal Robocalling

Numeric Futures contractual terms allow it to enforce actions against customers that generate illegal or fraudulent traffic. Numeric Futures current terms and conditions prohibit the use of Numeric Futures services for any fraudulent or unlawful purposes. If Numeric Futures reasonably suspects that any of its services is being used for fraudulent or unlawful purposes, Numeric Futures reserves the right to suspend or terminate such service with immediate effect. Numeric Futures does not and will not hesitate to enforce such contractual terms.

When non-compliant calls come to our attention, through our own analysis or via a voice services provider, we shall promptly investigate and take necessary action with the offending customer to mitigate ongoing illegal activity.

Know Your Customer “KYC”

Numeric Futures is a long-established small provider that maintains a close relationship with its customers. Numeric Futures ensure that each customer is thoroughly vetted at the outset, when contracts are renewed or additional services are added. Terms and Conditions are in place to ensure partners and end users are aware of a zero tolerance approach to illegal activities including robocalling, fraud and abuse.

We obtain full contact and company details and at the outset of any new relationship, we conduct initial research into the customer and have regard to any history of enforcement actions, public complaint and other business reputational data regarding the customer.

Numeric Futures use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Know Your Upstream Provider

Numeric Futures have master service agreements with all upstream providers who abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Numeric.

Calls are routed via upstream providers who have implemented their own monitoring and detection technical functionality. We work closely with upstream providers to eradicate unlawful behaviour and work closely with them to carry out the required mitigation functions.

We work closely with the provider to investigate any suspicious activity found by the carrier's monitoring systems or reports to Numeric by subscribers or third parties.

Network Monitoring

Numeric Futures (and our carrier partners) use a variety of methodologies, solutions and related reporting tools monitoring our voice traffic for suspicious calling patterns to prevent the origination of illegal robocalls. We monitor the CPM rate for all customers and monitor large volumes of calls simultaneously over a short period, look at call durations etc. We look at anomalies in costs generated by calls from a single customer. We investigate and block suspected numbers, suspicious traffic via various traffic monitoring alerts and CDR reports.

Numeric Futures act promptly and decisively on anything suspicious detected by our monitoring and will investigate any anomalies further, checking recent and past CDR's to benchmark against expected trends, checking recent and past account activity, verifying call paths, contacting the customer to investigate. Numeric Futures review and adjust parameters and processes to ensure that we learn and improve.

Traceback and Enforcement Cooperation

Numeric Futures will respond fully and in a timely manner to all call traceback requests from the FCC, Traceback Consortium, Law Enforcement and other authorised US departments. We will cooperate with all authorised entities to immediately identify and stop any robocalls or any other calling abuse from our network.

Numeric will review this Robocall Mitigation Plan and update it as necessary to meet the requirements of applicable laws.