

DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

xtDirect LLC uses Inteliquent as our only termination provider and here is their plan.

As part of Inteliquent's¹ submission to the Robocall Mitigation Database, this document describes (1) the specific reasonable steps Inteliquent has taken to avoid originating illegal ro-bocall traffic as part of its robocall mitigation program, (2) its participation as a member of a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution, and (3) its commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the in-dustry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

¹ As described more fully in Section I below, for the purposes of this submission, "Inteliquent" refers to a number of related entities.

I. ENTITIES COVERED BY CERTIFICATION

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

- • ANPI Business, LLC
- • ANPI, LLC
- • Inteliquent, Inc.
- • Onvoy, LLC
- • Onvoy Spectrum, LLC.
- • Voyant Communications, LLC

Onvoy, LLC is the direct or indirect parent of each of the other entities listed above, and all of these entities are subject to the same robocall mitigation plan. For the purposes of this document, these entities are collectively referred to as “Inteliquent.”

II. EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

Inteliquent has made meaningful investments to implement network upgrades and offer new features to combat illegal robocalls as part of its robocall mitigation program. Inteliquent deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio (“ASR”), and call count carrier/consumer reports. As part of its robocall mitigation program, Inteliquent provides the following solutions on its network to help minimize the impact of illegal or unwanted robocalls on customers:

- **• Randomizer:** Utilized for customer traffic which is sent to Inteliquent via a Least Cost Routing (“LCR”) engine. Based on calling party telephone number analytics, an announcement is played to the calling party that requires the calling party to enter two randomly generated digits to complete the call. If the correct digits are not entered, the call will not proceed (machine generated calls presumably are unable to enter the randomly generated digits).
- **• Automatic Number Identification (“ANI”) Management:** Utilized for customer traffic which is sent to Inteliquent via a LCR engine. ANI Management is used to identify and block originating telephone numbers that are deemed abusive based on repeat attempts to reach the Inteliquent network.
- **• Proactive Blocking:** Applied to all traffic. Per rules adopted by the Commission in FCC 17-151, Inteliquent blocks calls from phone numbers on Do-Not-Originate (“DNO”) lists from US Telecom and Neustar. In certain circumstances, Inteliquent also blocks calls that originate from invalid, unallocated, or unused numbers.

Through reports generated by Call Detail Record (“CDR”) and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, Inteliquent is able to identify potential unlawful robocalling.

In some situations, when Inteliquent suspects it has identified unlawful calling, in addition to taking the steps identified above, it also may contact the party sending Inteliquent the 3

calls (i.e., Inteliquent's carrier/provider customer), and request that they work to investigate their customers (e.g., to identify the party sending them the calls, determine whether the calls are unlawful, and then to eliminate the source of the calling). When Inteliquent believes it has identified fraudulent activity, it reserves the right to take any action it deems necessary to eliminate the fraudulent activity.

III. Know Your Customer Program

Inteliquent has established and implemented comprehensive Know Your Customer ("KYC") policies for any new and existing customers. The objective of the KYC policy is to prevent Inteliquent from being used, intentionally or unintentionally, for spoofed or illegal traffic. KYC procedures enable Inteliquent to know and understand its customers and their use policy better, which in turn helps Inteliquent manage unacceptable traffic.

IV. LEADERSHIP ON STIR/SHAKEN DEVELOPMENT AND IMPLEMENTATION

Per the Commission's rules, regarding the portions of its network that rely on technology that cannot initiate, maintain, and terminate SIP calls, Inteliquent is prepared to provide the Commission documented proof of its participation as a member of a working group, industry standards group, or consortium that is working to develop a non-internet Protocol caller identification authentication solution. In addition, Inteliquent provides the following brief description of some of its efforts to date:

First, Inteliquent is a leading industry proponent regarding the implementation of STIR/SHAKEN, including as a member of the board and certain committees of The Alliance for Telecommunications Industry Solutions ("ATIS"). Via ATIS, Inteliquent has provided input into the development of the industry guidelines for STIR/SHAKEN implementation. 4

Inteliquent is also a founding member of the Industry Traceback Group (“ITG”) sponsored by USTelecom. The ITG is a collaborative effort of companies across the wireline, wire-less, VoIP and cable industries that actively trace and identify the source of illegal robocalls. Moreover, Inteliquent also served on the Robocall Strike Force established by the Commission in 2016. The Robocall Strike Force was created to accelerate the development and adoption of new tools and solutions to abate the proliferation of illegal and unwanted robocalls, to promote greater consumer control over the calls they wish to receive, and to make recommendations to the FCC on the role government can play to stop unlawful robocalls.

Finally, Inteliquent is also actively engaged in providing information to its customers to help them become STIR/SHAKEN compliant (for example, through webinars) and to meet the regulatory deadlines to do so.

V. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS

Inteliquent is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to co-operating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Inteliquent has also worked with the FTC and state attorney general counsel to participate in traceback efforts, further demonstrating its commitment to such important efforts.