

BitVoip

Robocall Mitigation Plan

Policy:

Bitvoip Inc is a reseller for FlowRoute (a BCM One Company) and all the calls from our systems are exclusivity going through their network.

- All calls that it originates from our network are subject to a robocall mitigation program (see details bellow)
- Our prior certification has not been removed by the FCC action and it has not been prohibited from filing in the RMD
- As resellers we are not required to implement STIR/SHAKEN because Flowroute as an upstream provider are doing it on their end.
- We have not been subject to a Commission or other law enforcement agency action or investigation in the prior two years.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use software provided by FlowRoute to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

Combining behavioral analytics, caller authentication and verification, our solution features:

Fraud Detection: Detection of high volume robocalling, spoofing and spam call activity.

Subscriber Notification: Caller ID Name override to warn subscribers of suspicious calls.

Call Blocking Support: Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)

Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.

Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.

In addition, we have implemented a Call Abuse Policy and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the BitVoip network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the BitVoip network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”