

Top Notch Networking, LLC

Robocall Mitigation Policy

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant. The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- Details the reasonable steps taken to avoid originating illegal robocalls
- Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- Is filed in the Robocall Mitigation Database

This mitigation plan is submitted on behalf of Top Notch Networking, LLC, a VoIP service provider and will be referred to as TNN throughout this document. TNN serves the Inland Empire area of Southern California and has no customers outside of this general region. TNN is a small VoIP service provider of exclusively SIP based services on its network.

II. STIR/SHAKEN Implementation

TNN is a very small VoIP Service Provider. With that said, Its traffic is limited to two upstream providers. Bandwidth.com is used as it's primary upstream carrier, and Telnyx is used as it's secondary carrier. TNN has verified that STIR/SHAKEN is implemented within its network, and is fully implemented with both of our upstream providers. All traffic is validated and assigned a Full Attestation (A) classification.

III. General Prohibition Against Illegal Robocalling

TNN end user services are subject to restrictions contained in its published legal notices and all executed service agreements include the requirement that service is provided pursuant to its terms of service ("TOS") requirements. Its existing TOS prohibits activities normally associated with Robocalling including, but not limited to:

- Providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call
- Violating any applicable local, state, or federal law; using TNN's service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of this publication of its updated TOS.

IV. Know Your Customer

TNN utilizes the mitigation technique of “Know Your Customer.” TNN is a small, long established provider that maintains a close relationship with its subscribers. Its customers are generally “mom and pop” users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted inhouse analytics to monitor, alert and apprehend suspected robocalling activities. TNN has set a call path level on a per customer basis related to their respective size. TNN screens all new customers requesting service for the following:

- Businesses must provide a valid tax ID and verification as to the nature of their business.
- TNN verifies addresses for overlapping / multiple deployed voice path subscriptions
- Businesses submit to on-site TNN representatives visit during the setup process to verify the number of users at the location is appropriate for the volume of calling

TNN provides not only VoIP services, but also managed IT services to its end users. These end users are well know by our staff and the business use of our services are clearly understood by all parties and enforced to comply with our TOS.

IV. Network Monitoring

TNN, along with its software partners, is continuing to develop custom software that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capabilities are being added to the software which will automatically disable any subscribers associated with flagged call patterns.

V. Traceback and Enforcement Cooperation

TNN will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. TNN will dedicate sufficient resources to provide prompt and complete responses to traceback requests.