



Robocall Mitigation Plan for Anonymome Labs, Inc

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The purpose of this Robocall Mitigation Plan (RMP) is to implement best practices, procedures, and policies to mitigate or reduce originating illegal traffic (aka robocalls). This document details the “reasonable steps” that Anonymome Labs has taken to avoid originating, carrying, and/or processing illegal robocall traffic. All voice traffic that originates from our products is subject to this robocall mitigation program.

About the Anonymome Labs Platform

Anonymome Labs provides direct-to-end-consumer mobile- and web-based applications that incorporate several privacy and cyber safety tools into a single, integrated privacy and cyber safety solution. Some Anonymome Labs products include limited-use telephony features and services that can be accessed and used through the Anonymome Labs platform. The Anonymome Labs platform does not allow end users to initiate person-to-person communications via the PSTN outside of the platform.

To offer these services, Anonymome Labs relies on third-party carriers to obtain access to PSTN numbering resources and to those providers’ network infrastructure. Anonymome Labs does not control, manage, or have access to its PSTN partners’ facilities or network infrastructure. However, when outgoing calls are initiated via the Anonymome Labs platform, Anonymome Labs conveys to the third-party carrier the originating telephone number to ensure its products and services do not impede its PSTN partners’ ability to implement STIR/SHAKEN or other robocall blocking features. Anonymome Labs verifies that the number is in Anonymome Labs’ inventory and assigned to the consumer making the call, which prevents Anonymome Labs’ customers from spoofing the originating number.

Robocall Mitigation Measures

- ***“Know-Your-Upstream Provider” Procedures.*** Although Anonymome Labs does not manage, control, or have access to its PSTN partners’ facilities or numbering plan lists, Anonymome Labs undertakes extensive “know your upstream provider” efforts.
 - Anonymome Labs only uses upstream voice service providers that are reputable and that Anonymome Labs understands to be STIR/SHAKEN compliant. Anonymome Labs has ongoing relationships with its service providers, including through face-to-face communications via video conferences or other communications, and has specifically requested and received statements from those upstream voice service providers as to their STIR/SHAKEN compliance. Anonymome Labs understands that all outbound calls originating from Anonymome Labs’ products are signed with attestation by those same upstream voice service providers.
- ***Know Your Customer Measures.*** Anonymome Labs employs several affirmative and effective mitigation measures to prevent new and renewing customers from originating illegal calls, and to detect and eradicate robocalls from originating on the Anonymome Labs platform:
 - Anonymome Labs employs a variety of techniques to ensure that bots and other automated processes cannot register to use our products. These techniques rely on security features embedded in the Apple iOS and Google Android mobile device platforms to prevent our applications from running on simulators/emulators.
 - All customers are subject to Anonymome Labs’ Terms of Service and the acceptable use terms within those terms, which expressly prohibit any type of high-volume calling or automated dialing (robocalling) with our products. We do not permit the use of our products for illegal, unlawful, harassing, libelous, abusive, threatening, or disruptive purposes. Customers with suspicious call patterns have their use of our products suspended.
- ***Analytics-Based Tools and Use of Third-Party Vendors***
 - Anonymome Labs uses analytics to monitor for high call volumes, short-duration calls, and excessive calls to invalid telephone numbers from end customers using our platform. In many cases, detection of abnormal activity leads to automatic suspension of a customer’s use of our products. In more marginal cases, abnormal activity requires manual review by the Anonymome Labs Risk and Compliance team before action is taken.
 - Anonymome Labs designs, implements and operates all analytics systems used in the monitoring and mitigation of robocalling described above. No third-party analytics vendors are used in Anonymome Labs’ robocall mitigation program.

- ***Other Robocall Mitigation Measures***

- Anonymome Labs' telephony-related services and features are integrated into all-in-one privacy-enabling mobile and desktop apps. Anonymome Labs does not provide, nor do our platforms support, telephony APIs.
- Anonymome Labs offers a variety of subscription plans for the use of its platform, most of which include a limited-use telephony component that provides a modest amount of fixed calling minutes for personal use only. In addition, as noted above, the platform does not support telephony APIs. As such, the Anonymome Labs platform is not considered useful or attractive for robocallers.
- All outbound calls must be placed through the Anonymome Labs platform. Calls from our products are placed with the Caller ID of the telephone number assigned to that customer. No Caller ID spoofing is permitted. Customers are not provided a method to alter the Caller ID of their outgoing calls.
- The Anonymome Labs platform allows users to block incoming calls from unwanted numbers. Recipients of calls made through the Anonymome Labs platform can block these calls just like they would any other number on the PSTN.
- Anonymome Labs promptly responds to traceback requests from upstream providers. Anonymome Labs cooperates with such entities in their efforts to investigate and stop any illegal robocallers from using its services to originate, carry, or process illegal calls.

Commitment to Responding to Traceback Requests

Anonymome Labs commits to fully respond to traceback requests from the FCC, law enforcement, and the industry traceback consortium within 24 hours. Anonymome Labs will cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate, carry, or process illegal calls.