

Mitigation plan for Robocalls

In this document, Talk360 provides the information required by § 64.6305 (b) (2) of the FCC's rules, which are instated to prevent Robocall traffic.

I. Extensions received

Talk360 is classified as a "small voice service provider" as defined in § 64.6304 (a) and applies for extension of the deadline for the requirements stated in § 64.6301 until June 30 2023.

II. Reasonable steps taken to avoid originating illegal robocall traffic

Talk360 takes the following reasonable steps to avoid originating illegal robocall traffic:

- Before allowing any user to make a call using the Talk360 voice service, we validate the account's phone number using industry-standard technology SMS verification from Google. This guarantees that the originator of the call owns the originating phone number.
- All calls made with the Talk360 voice service have to be made using the Talk360 App on Android or iOS. These Apps uses non-standard VoIP technology, which significantly increases the complexity of creating a system for automated dialing (Robocalls)
- Talk360 only allows an account to have a maximum of 3 simultaneous calls at any point in time. This significantly reduces the effectiveness of any automated dialing mechanism.
- Talk360 implemented several real-time fraud mechanisms to detect and block any fraudulent activities.
- Talk360 monitors for any out-of-the-ordinary voice traffic and dial patterns and has procedures to directly investigate and take appropriate actions, including but not limited to blocking accounts.

III. Statement of commitment to requests for traceback

Talk360 commits to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.