

Robocall Mitigation Program Description For:

Web Ventures LLC DBA HumbleFax.com

Mitigation Program Summary

HumbleFax.com is, by design, preventative with regards to robocalls.

1. Only fax calls can be made, thus limiting the usefulness for a potential abuser. No kinds of custom voice recordings can be transmitted.
2. Only DID's that are purchased and registered, or numbers that are in the process of being ported in are allowed to generate outgoing calls.
3. Bursts of unusual activity such a high call volume spikes, or high percentage of unsuccessful faxes indicating dialing non-fax numbers are monitored and investigated as necessary.

We are committed to responding within 24 hours 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 our service to originate calls. Although, as mentioned above, it is unfeasible to generate such calls with our service.

Certification

We have fully implemented STIR/SHAKEN in conjunction with our three providers:

1. Inteliquent
2. Telnyx
3. Flowroute

Pursuant to §64.1200(n)(3), if notified by the Commission enforcement bureau or the like that robocall traffic has been generated by our service, we will conduct a swift investigation into the associated user's account.

The terms of HumbleFax.com ensure the user's privacy except in the event of any legal inquiry, not limited to such an inquiry by the Commission or the like. Therefore, it would be within our rights to look at the user's account in full, including the contents of the faxing materials being disseminated, and the resulting call logs.

Our system keeps a record of call logs for perpetuity. The user can delete the fax contents due to HIPAA guidelines, but we should be able to get an idea of call activity nonetheless.

If there is even the smallest amount of evidence to support the complaint, we will immediately cancel the user's account without warning, and ban their:

1. IP addresses used to login during the history of the account
2. Payment methods used
3. Email addresses used

We are also more than willing to supply these details to the commission including the fax contents, call logs, ip addresses, email addresses, etc to the Commission for further investigation on their part. We are committed to assisting in any effort to reduce Robocalls. Anecdotally, on a personal level, we all suffer from wasted time due to Robocalls every single day.

HumbleFax.com does not use any third party analytics tools. We have our own database with simple queries and an intuitive graphical user interface (GUI) to analyze activity. We also have regular time-based queries that run reports and generate alerts if anything out of the ordinary is occurring. These queries are constantly being refined and improved with heuristic inputs.

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In the past two years, our service has never been the subject of a robocall investigation by any entity. However, we do contend with scams typically related to the medical field. In these cases, we are served with subpoenas from law enforcement agencies and cooperate fully. This is the kind of problem that our system cannot automatically stop, and is an ongoing battle.