

## **Robocall Mitigation Plan**

This robocall mitigation plan is for HelloSpoke (ICIM Corp. dba HelloSpoke), with headquarters at 118 East Main Street, Louisville, KY 40202.

HelloSpoke performs the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users
- A non-gateway intermediate provider with a STIR/SHAKEN obligation
- A gateway provider with a STIR/SHAKEN obligation

HelloSpoke has not been prohibited from filing a certification in the Robocall Mitigation Database. HelloSpoke has no history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

## **Principals, Affiliates, Subsidiaries and Parent Company**

ICIM Corp. dba HelloSpoke is a privately held LLC located in Louisville, Kentucky, owned by David Durik and Phil Hawkins. HelloSpoke has no affiliates, subsidiaries, or parent company.

## **Know Your Customer**

HelloSpoke follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with each customer. We use this information to determine whether the customer is subject to any enforcement actions that restrict their calling activity, including bans on initiating telemarketing calls.

We validate, when possible, that each customer has a legitimate right to use its asserted calling numbers. This supports the attestation level we assign to calls we originate on their behalf.

Our customer agreements contractually prohibit the initiation of illegal robocalls. If a customer is found initiating suspicious robocall traffic, we issue a warning to cease. If the behavior continues, we terminate their service.

## **Know Your Upstream Provider**

HelloSpoke maintains a vetting and review process for all upstream providers that send us voice traffic for termination or transit.

We confirm that each upstream provider holds a current certification in the Robocall Mitigation Database and will not accept voice traffic from any unregistered provider. We require upstream providers to maintain a reasonable robocall mitigation plan, including customer and upstream provider vetting and the use of call analytics to identify suspicious traffic.

We establish an understanding of each upstream provider's role in the call path, including whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to determine our authentication obligations for unsigned traffic we receive.

Our agreements with upstream providers contractually prohibit the transmission of illegal robocalls. If an upstream provider is found sending suspicious traffic, we issue a warning to cease. If the behavior continues, we terminate the relationship.

## **Traceback**

HelloSpoke responds within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium (US Telecom Industry Traceback Group). We cooperate fully with these entities to investigate and stop any illegal robocalls using our network to originate, carry, or process illegal robocalls.

## **Robocall Mitigation Program**

HelloSpoke uses call analytics software provided by Trans Nexus to monitor all outbound voice traffic in real time. The software provides detailed reporting to identify suspected illegal robocalls and alerts us when outbound calls involve calling numbers with poor reputations or numbers that are invalid, unallocated, or listed on a Do Not Originate (DNO) list. We apply the same mitigation steps to all outbound calls regardless of our role in the call chain.

Upon identification of suspicious traffic, we immediately investigate to determine whether the caller or upstream provider was attempting to originate or transit unlawful robocalls. If the traffic is determined to be likely unlawful, we warn the responsible party to cease. If the behavior continues, we terminate their service.

**STIR/SHAKEN**

HelloSpoke has registered with the STI-PA using OCN 495K. We hold our own STIR/SHAKEN certificate issued by the Trans Nexus Certification Authority (STI-CA) and have implemented a STIR/SHAKEN solution supplied by Trans Nexus for authenticating calls we originate.