

HAASTECH, LLC

ROBOCALL MITIGATION PLAN

OVERVIEW

Haastech offers reseller services to small end customers using customized UCAS system.

The inbound/outbound service provider for Haastech LLC is registered in Robocall Mitigation database.

Haastech LLC has taken the following steps to mitigate Robocalling activity:

- Haastech LLC only sells services to end user customers who don't run autodialing at any level. We don't sell SIP only services. All our customers use our PBX solution.
- Active monitoring of calls for suspicious calling patterns and volumes.
- SIP traffic is only permitted to/from Haastech LLC authenticated inbound and outbound service providers.
- Blacklisting/Whitelisting of IP and countries capabilities to prohibit identified robocall traffic from passing through Haastech LLC.

Haastech LLC will always cooperate and quickly investigate and mitigate any complaints or requests from our service providers and carriers regarding potential fraud or robocalling activity.

POLICY

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use software provided by Bandwidth to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

Combining behavioral analytics, caller authentication and verification, our solution features:

Fraud Detection: Detection of high volume robocalling, spoofing and spam call activity.

Subscriber Notification: Caller ID Name override to warn subscribers of suspicious calls.

Call Blocking Support: Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)

Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.

Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.

In addition, we have implemented a Call Abuse Policy and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the Haastech network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the Haastech network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”