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Robocall Mitigation Plan

This Robocall Mitigation Plan is filed in compliance with, *inter alia*, 47 C.F.R. § 64.6305 by Clarity Communication Advisors, Inc. ("Clarity" or "Clarity Voice"), with its headquarters at 2 Corporate Drive, Suite 250, Southfield, MI 48076. Clarity is not a foreign provider, has no business names previously used other than Clarity or Clarity Voice, and has no parent, affiliates, or subsidiaries. Clarity's single point of contact for addressing robocall mitigation-related issues is:

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Clarity has fully implemented the STIR/SHAKEN authentication framework in the IP portions of its network. Clarity is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. Clarity has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action, including the new enforcement requirements adopted in the Federal Communications Commission's *Sixth Report and Order*.¹

Clarity does not have any history of enforcement actions for illegal robocalls. At no time in the prior two years has Clarity (nor any entity for which Clarity shares common ownership, management, directors, or control) been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Clarity uses the following effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

Clarity, a VoIP-based Hosted PBX provider offering Cloud Phone Service to end users, follows the [best practices](#) for vetting caller identity and operational legitimacy for new and existing customers described by the NANC Call Authentication Trust Anchor Working Group, including

¹ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18.



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but not limited to subscriber vetting and outgoing caller identity validation.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do (e.g., if they have been banned from initiating telemarketing calls).

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

Clarity commits to respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within 24 hours and to cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

STIR/SHAKEN

We have registered with the STI-PA using OCN 297K. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending



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such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

New Customer Screening

Clarity uses a direct sales model and verifies the business activity, physical location, and credit worthiness of every customer. Clarity has visibility into the customer premises equipment that customers use in connection with Clarity's services and only Clarity registered devices are permitted to be used with Clarity services. 100% of our customers are located in the United States and Canada. We port existing numbers to and from Tier 1 carriers, and only originate or terminate calls with Tier 1 carriers, each of which has their own mitigation strategies.

Active Customers

All of our customers have access to call screening and the ability to block callers by CallerID information. We monitor all calling activity using analytics to flag automatically and shut down calling patterns that are indicative of robocalls, including both toll fraud and calling patterns that violate our MSA, such as the use of automatic dialers. All of our customers have a rate limit and internal alarms are triggered if a customer's concurrent call limit is reached.