



Robocall Mitigation Plan for FCC Compliance: iTeraTEL Communications Inc.

1. iTeraTEL's Role in the Call Chain

- iTeraTEL primarily plays the role of an originating voice service provider.
- iTeraTEL has under 5 wholesale partners that has their own switch and secures DIDs and terminates calls on iTeraTEL's network. Currently these providers customers make calls within Canada. We have notified these providers of the requirements:
 - Know their customer & nature of their business.
 - Not to spoof name and number display
 - Notified about their requirements to assist in any call trace back request.

2. STIR/Shaken Deployment

- iTeraTEL lacks the control over the network infrastructure necessary to implement STIR/Shaken.
- In addition to the below, iTeraTEL has taken reasonable steps to mitigate and reduce the potential origination of robocall traffic.
 - All US DIDs are secured from Inteliquent (a Sinch company).
 - All US calls are terminated by either Inteliquent or ISP Telecom (a Canadian CLEC) which also terminates iTeraTEL's US based traffic.
 - iTeraTEL has executed an agreement with Inteliquent to manage our STIR/Shaken requirements.
 - Outbound calls are signed by either Inteliquent or ISP Telecom 's certificate.
 - Attestation A is used when DIDs that are registered with them is terminated.
 - Attestation B is used when DIDs from another provider is submitted.
 - Currently iTeraTEL secures all US DIDs from Inteliquent
 - Inteliquent and ISP Telecom forwards the headers for inbound calls to iTeraTEL.
 - iTeraTEL will cooperate with all service providers, regulatory agencies, and law enforcement with any call trace back investigations.
 - All call trace back requests are to be sent to calltraceback@iteratel.com

3. Identification and Authentication

- Internal Processes
 - iTeraTEL only processes calls where it is in control of the DID. It does not terminate calls on behalf of any international carriers.
 - All calls that iTeraTEL originates from the iTeraTEL network are DIDs that are registered on its switch. iTeraTEL and iTeraTEL knows the end user.
 - iTeraTEL requires a signed copy of all phone bills for numbers that are ported into the iTeraTEL network.
 - iTeraTEL does not terminate calls from providers that are only seeking termination. (i.e. no long-distance providers seeking to terminate traffic)
 - All wholesale partners provide with their own switch follow the same process of providing iTeraTEL with a phone bill with the end user's contact information. (iTeraTEL has less than 5 customers in this category.)
 - iTeraTEL does not provide its white label or wholesale partners a pool of DIDs to assign to their end users. iTeraTEL providers are required to provide iTeraTEL with end user information.

4. Call Blocking and Filtering

- iTeraTEL's SBC will block all calls originating on its network that are not in its DID database.
- VoIPMonitor is the analytical tool that iTeraTEL uses to monitor all of its calls as well as RoboCall attempts. This is supplemented by the Ribbon SBC
- iTeraTEL's monitors all traffic that transverses its network. It identifies any abnormal traffic as well as short calls.

5. Other Measures

- iTeraTEL's terms of service permits it to immediately suspend or terminate service to its customers (either direct or via the wholesale channel) in the event that they violate our terms of service, is unlawful or violates any regulatory rules.
- Knowing our customers
 - iTeraTEL's focuses primarily on the business-to-business segment. (resellers and white label partners account for less than 2% of iTeraTEL's revenue).
 - iTeraTEL rarely signs up a new business, thus our client base has been in operation for a number of years, and we verify the business segment.

- Clients with internal call centers, support their end clients and the majority of the calls to them are inbound.
- For any potential call center clients that iTeraTEL engages, a review of the regulatory environment for Robo Calls and spoofing telephone numbers. At this time, iTeraTEL does not have any customers in this category.
- iTeraTEL's terms of service with its own direct end users as well as resellers and white label partners, permit it to terminate services immediately for customers that violate any regulatory, legal or iTeraTEL policies.
 - Engage or encourage conduct that would constitute a criminal offense or give rise to civil liability, otherwise use the Service in a manner which is contrary to law or regulatory restrictions.
 - Use the service to transmit messages constituting SPAM or RoboCalls that are contrary to law or regulatory requirements.
 - Not to make solicitation calls to any person/entity on the National Do Not Call List.

6. iTeraTEL Response Time

- iTeraTEL commits to responding to all traceback inquiries within 24-hours Monday to Friday, between 8am and 6pm EST. Requests received on holidays and weekends will be responded on the next business day.
- iTeraTEL will provide traceback to the required regulatory agencies, law enforcement and the industry traceback consortium. It will cooperate with such entities in investigating and stopping illegal robocalls that use its service to originate or process illegal robocalls.

11. Corporate Structure

iTeraTEL Communications Inc., is a closely held private corporation, with the primary principal being Hadi Maleki. iTeraTEL has an affiliate, iTeraCARE that provides managed service provider services to companies. All telecom services are offered through iTeraTEL.