



NOI Telecommunications

Robocall Mitigation Plan

The following policies apply to all customers and/or prospective customers of NOI Telecom and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic from our network:

1. **Contract Requirement:** Our agreements clearly prohibit passing illegal robocalls through any of our switches or networks and define precise requirements for ASR, LCD and other traffic statistics. Customers who violate these rules are subject to immediate termination without notification. If NOI Telecom believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality and all data will be shared with industry partners and law enforcement as required by regulatory bodies
2. **Customer Disclosures and Confirmation:** All customers are required to disclose certain information about their business such as physical location, contact personnel, state/country of incorporation or business formation, federal tax I.D. or non-USA government I.D. They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic which originates from each customer's switch including the type of customers they acquire and exact type of services they provide. NOI Telecom investigates each Customer's claims to verify accuracy before accepting them as a customer
3. **Monitoring and Traceback:** NOI Telecom monitors its system diligently and will investigate any suspicious traffic. We act promptly when we detect traffic which appears to be robocall activity to ensure it has been pre-authorized as "legal" (i.e. authorized political, non-profit, reverse 911 or fully-opted-in traffic). In the event NOI Telecom receives a Traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s) and insist on immediate corrective action. We timely respond to all Traceback request from authorities. If corrective action is not timely provided by our customer, NOI Telecom takes whatever action is necessary to prevent recurrence of the event(s).
4. **Publication and Notification:** NOI Telecom publishes in the public section of its website this Robocall Mitigation Plan and further pro-actively notifies all customers of such policy along with keeping a record of such notifications.
5. **Call Blocking:** NOI Telecom blocks all calls originating from numbers known to us to send illegal robocall traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation
6. **Law Enforcement Cooperation:** NOI Telecom cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.
7. **Implementation of the STIR/SHAKEN:** NOI Telecom has implemented STIR/SHAKEN protocol with all customers and on all end points

8. **CNAM:** The CNAM API will provide CallerID name look-ups as well as a fraud score. This score is a number between 0 and 100 that is basically the chance that the caller is a part of some fraudulent activity. This score is based off of a number of different things, but we treat the Caller Name differently depending on the score:
- Score 60-79: Robo? Name (Prepend Robo?)
 - Score 80-98: Spam? Name (Prepend Spam?)
 - Score 99-100: Fraudulent Call (Complete Overlay)
- For example , if we had a Caller Name of “VOIP INNOVATIONS” with a score of 71, it would instead be displayed as “ROBO? VOIP INNO”. The same Caller Name with a score of 99-100 would be completely replaced and just show “Fraudulent Call”.