

Level365 Robocall Mitigation Plan

Introduction

Level365 submits this Robocall Mitigation Plan (“Plan”) pursuant to 47 C.F.R. § 64.6305. This Plan outlines Level365’s comprehensive approach to mitigating illegal robocalls in accordance with Federal Communications Commission (FCC) regulations. It reflects our commitment to safeguarding our network and customers while adhering to industry best practices. This Plan will be reviewed and updated as necessary to align with changes in technology, regulations, and company operations.

Roles in the Call Chain

Level365 operates as a voice service provider, implementing STIR/SHAKEN and 10DLC registration process through The Campaign Registry (TCR) protocols across our Unified Communications as a Service (UCaaS) platform to ensure secure and authenticated voice traffic.

STIR/SHAKEN Implementation Status

Level365 has achieved full implementation of the STIR/SHAKEN Caller ID Authentication Framework across its network as of April 1, 2024. This ensures compliance with the FCC’s requirements for mitigating illegal robocalls and enhancing caller ID accuracy.

Acceptable Use and Terms of Use Policies

Level365 enforces strict Acceptable Use and End User Terms of Use policies to prevent misuse of its services. Customers and end users are prohibited from:

1. Using Level365’s services for fraudulent or illegal activities.
2. Transmitting inaccurate or misleading caller ID information with malicious intent.
3. Engaging in activities that compromise network security or facilitate unauthorized access.

The Level365 Robocall Mitigation Policy is incorporated by reference into the Level365 Terms and Conditions (<https://level365.com/terms-and-conditions/>) and applies to all Level365 customers. Under the Level365 Robocall Mitigation Policy, customers agree to comply with applicable laws and the Level365 Robocall Mitigation Policy.

New and Renewing Customer Vetting Process

To prevent malicious actors from gaining access to our services, Level365 implements a rigorous vetting process:

1. Information Accuracy: New and renewing customers must provide accurate and complete legal and contact information.
2. Verification Tools: We employ third-party tools to validate customer information.

3. Behavior Monitoring: Anomalous account activities, such as unusual IP addresses or payment methods, are flagged and investigated.

Authentication, Monitoring, and Mitigation

Level365 utilizes 24/7 real-time traffic monitoring tools to detect and address abnormal call patterns. Our Fraud Operations team and Network Operations Center collaborate to:

1. Investigate suspicious traffic and terminate offending accounts.
2. Monitor SMS traffic to prevent misuse.
3. Analyze traffic patterns to proactively identify threats.

Traceback Commitments

Level365 is committed to responding to traceback requests from the FCC, law enforcement, and the industry traceback consortium within 24 hours. We actively cooperate with these entities to investigate and mitigate illegal robocalls.

Ownership and Management

Level365 has no parent company and is privately held, incorporated in the state of Indiana with ownership and management details available upon request. As of the date of this Plan, Level365 operates without subsidiaries or affiliates impacting this Plan.

Commitment to Continuous Improvement

Level365 recognizes the evolving nature of robocall mitigation. We commit to:

1. Regularly reviewing and updating this Plan in response to changes in laws, regulations, or technologies.
2. Training our staff on best practices and new tools to enhance robocall mitigation.
3. Engaging with industry groups to stay informed and proactive in combating illegal robocalls.