

Robocalling Mitigation Policy

As required by the FCC, Captive Communications, LLC d/b/a OneCloud Networks hereby submits the following Robocall Mitigation Plan for compliance with the TRACED Act. This mitigation plan has been implemented to ensure that robocall and illegal traffic does not originate on the Captive Communications voice network.

Captive Communications provides VoIP services to businesses in the United States of America. Captive Communications currently provides far less than 100,000 lines of service and therefore are not currently required to implement a STIR/SHAKEN Solution until June 30, 2023. We have however been provided an “A” attestation for our outbound calls with our Underlying Carriers. The below details will provide additional details on efforts to mitigate robocalls and other illegal calls from originating on the Captive Communications Network.

1. Prohibition of Abusive Calling.

Captive Communications currently prohibits the use of services that would infringe upon any law in its ToS (Terms of Service). Additionally, the Captive Communications ToS states in Section 15, “End User agrees that Captive Communications Business Plans do not confer the right to use the service for auto-dialing, continuous or extensive call forwarding, telemarketing (including without limitation charitable or political solicitation or polling), fax broadcasting or fax blasting.”

2. New Customer Vetting and Service Limitation

New Customer onboarding goes through a rigorous provisioning process to ensure Captive Communications can service the customer’s needs as well as ensure that the customer can conform to Captive Communications ToS.

Captive Communications limits the concurrent call capacity of all of its customers to be a multiple of the number of subscribers the customer had contracted for. All SIP Trunk customers have both limits on call concurrency as well as CPS (Calls per Second).

3. Call Monitoring

Captive Communications Monitors all calling traffic 24 hours a day, 7 days a week. We look at overall volume, daily and weekly trend analysis, traffic pumping metrics and theft of service metrics. We utilize both international and domestic fraud protection services that automatically look for Robocalling and fraud patterns, then automatically block all outbound calls from any telephone number that crosses a predefined threshold.

4. Traceback and Enforcement Co-operations

Captive Communications will cooperate fully with the traceback community including the FCC, States' attorneys general, law enforcement bodies and the ITG to investigate and stop illegal robocalls. Captive Communications has designated appropriate resources to ensure all matters are dealt with promptly.

Contact:

Haider Mirjat

CEO

hmirjat@onecloudnetworks.com

972-941-3134