

n2uitive Robocall Mitigation Program

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As part of n2uitive's submission to the Robocall Mitigation Database, this document describes: (1) n2uitive's stated exemption from compliance; (2) the specific reasonable steps n2uitive has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program; (3) its commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls; (4) n2uitive's process for updating its robocall mitigation program; and (5) exhibits.

I. EXEMPTION FROM COMPLIANCE

n2uitive is exempt from STIR/SHAKEN implementation requirements pursuant to the provision established for providers that, "lack control over the network infrastructure necessary to implement STIR/SHAKEN."¹

Specifically, n2uitive lacks control over the network infrastructure necessary to implement STIR/SHAKEN because:

1. n2uitive operates solely as a call recording platform for insurance claims carriers and does not control any of the network elements required for STIR/SHAKEN implementation, including Session Border Controllers (SBCs), SIP proxies, or call processing systems capable of inserting Identity headers into SIP INVITEs.
2. n2uitive relies entirely on Bandwidth, Inc. for all voice connectivity services. Bandwidth, as confirmed in the attached call flow diagram attached to this filing (Exhibit A), serves as the originating service provider with full control over the network infrastructure required for STIR/SHAKEN implementation.

Furthermore:

1. n2uitive's services function as a software application layer that works with voice services *provided by* Bandwidth rather than as a provider of the actual voice connection itself. The "first party" with STIR/SHAKEN implementation obligations is Bandwidth, not n2uitive.²

¹ First Caller ID Authentication Report and Order, FCC 20-42, para. 40 (2020) ("Finally, we clarify that the rules we adopt today do not apply to providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN.")

² Eighth Report and Order, FCC 24-120, para. 17 (2024) ("That compliance obligation does not change simply because the provider has an upstream customer (e.g., a reseller or a value-added service provider) that is not the ultimate end user of the voice service and does not itself have a STIR/SHAKEN implementation obligation, e.g., a

2. All call authentication occurs at Bandwidth using Bandwidth's SPC token and certificate.³

While n2uitive is currently registered in the RMD as a voice service provider, this updated filing clarifies that n2uitive likely does not meet the definition of a "voice service provider" under 47 CFR § 64.6300, as it does not "furnish[] voice communications to an end-user using resources from the North American Numbering Plan."⁴

n2uitive remains committed to the robocall mitigation efforts described in the remainder of this plan, including responding to traceback requests and cooperating with industry efforts to combat illegal robocalls.

II. EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

n2uitive does not maintain direct end-user relationships, but instead, operates as a service provider, primarily serving insurance claims carriers. As a result, n2uitive maintains a stringent customer qualification and onboarding process, resulting in long-term business-to-business relationships.

Once services are initiated through a signed contract, n2uitive relies on its trusted underlying outbound telephony service provider, Bandwidth, Inc., to place phone calls on behalf of individuals employed by the insurance carrier customer. These individuals initiate the voice traffic to themselves, and to customers and other parties related to insurance claims, according to their own standard operating procedures and the contract with n2uitive. This voice traffic is signed by Bandwidth, Inc. according to its own STIR/SHAKEN implementation.

III. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS & INTERNAL EFFORTS TO EFFECTUATE TRACEBACKS TO COMBAT ROBOCALLS

n2uitive is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and

reseller that qualifies for the STIR/SHAKEN exemption or a value-added service provider (VASP) that provides communications services that are ancillary to the voice service.")

³ Eighth Report and Order, FCC 24-120, para. 43 (2024) ("Specifically, we find that our section 251(e) numbering authority and the Truth in Caller ID Act each provide the Commission with independent authority to require providers that use third parties to authenticate calls to adhere to two limitations: (1) the provider with the STIR/SHAKEN implementation obligation under the Commission's rules must be the entity that determines whether A-, B-, or C- level attestation should be applied to the call; and (2) all calls must be signed using the SPC token of the provider with the implementation obligation.")

⁴ Title 47, 47 CFR § 64.6300 (o)(1), ("Means any service that is interconnected with the public switched telephone network and that furnishes voice communications to an end user using resources from the North American Numbering Plan or any successor to the North American Numbering Plan adopted by the Commission under section 251(e)(1) of the Communications Act of 1934, as amended;")

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to cooperating with such entities investigating and stopping any illegal robocallers that use its service to originate calls.

n2uitive also has internal traceback procedures in place. Telephony carriers and service providers are encouraged to send any request for fraud investigation or tracebacks to compliance@n2uitive.com.

IV. PLAN UPDATE PROCESS

n2uitive ensures that its plan is up to date and will apply all required changes to be compliant with Commission requirements. n2uitive will review this plan at least annually and evaluate any necessary improvement.

V. EXHIBITS

EXHIBIT A

