

Robocall Mitigation Plan

Assertions

LETS role in the call chain is as a non-gateway intermediate provider.

LETS only routes calls from known STIR/SHAKEN compliant providers with no exceptions and therefore only passes calls that provide authenticated caller identification information.

LETS has not been prohibited from filing in the RMD.

LETS has not been subject to an FCC, law enforcement, or regulatory agency investigation or action due to suspected unlawful robocalling or spoofing, and information about any such investigation or action.

LETS will respond to traceback requests from the FCC, law enforcement, and the industry traceback consortium.

Mitigation

LETS has taken the specific reasonable steps set forth in this document to avoid originating illegal robocall traffic as part of its robocall mitigation program. LETS is continuously analyzing the effectiveness of this program and reviewing best practices in this space. LETS reserves the right to modify and/or supplement the robocall mitigation measures included here to adapt to risks from bad actors and to improve the overall effectiveness of its program for the benefit of its customers.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify an outbound caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by LETS and/or obtained by LETS from one of our underlying carriers for use by the subscriber. LETS directly manages the TNs used by its subscribers. LETS tracks these numbers in its inventory system and monitors the assignment of these numbers.

Know-Your-Customer Initiatives

A customer is an entity that has a business relationship with LETS in which we transmit, originate, and/or terminate calls based on behalf of the subscriber. LETS KYC initiative program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

The program also ensures the customer has a valid email and phone number before being granted access to our voice service.

Contractual Terms and Other Conditions

LETS service agreements contain acceptable use and traffic integrity terms that prohibit using LETS services for illegal purposes including violating any applicable local, state, or federal law. LETS only contracts with voice providers that are STIR/SHAKEN compliant.

Volume Limitations and Manual IVR

LETS has implemented a policy that limits telephone numbers to one concurrent call. An individual subscriber line cannot be used for high volume calling. All outbound calls must be manually entered into an IVR system using DTMF tones. LETS does not provide an Application Programmer Interface (“API”) for calls to be placed. All calls must be placed by authenticated users through our app with manual entry.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. LETS will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue. LETS will also monitor changes to the FCC regulations that affect our operations and obligations.

In the event of any material change to this plan, LETS will republish it to employees, consultants and contractors affected by these regulations and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.