

ROBOCALL MITIGATION PLAN

W Cubed



W Cubed has not yet implemented STIR/SHAKEN, but does have robocall mitigation features in place.

Extension:

Under Section 64.6304, W Cubed has an extension until June 30th, 2023 to complete RMD implementation, as it has fewer than 100,000 subscribers. W Cubed will continue to push for complete STIR/SHAKEN RMD as soon as is feasible.

Robocall Mitigation:

On outbound calls, W Cubed currently acts to prevent Robocalls.

- W Cubed directly limits the number of concurrent calls that any user or organization can make.
- W Cubed does not allow modification of outbound caller-id by its users to be for numbers that they do not own or operate.
- W Cubed operates call volume monitoring and alerts administrators when the threshold is reached.
- W Cubed monitors for variance in interstate (and international) call traffic, and alerts administrators when significant out-of-pattern calls are made.

Additionally, W Cubed vets all subscribers:

- Company's customer base is primarily small businesses, who do not generally generate robocalls, and are restricted to their according service profile.
- Customers are generally well-known as individual organizations, including business and contact verification.
- W Cubed's terms of service to not allow customers to resell services, and allow for immediate termination or call restriction when abuse is detected.

Traceback:

W Cubed will respond to any traceback request from the FCC, law enforcement agency, or industry consortiums, and will work to eliminate and block all such calls.