

## **ROBOCALL MITIGATION PLAN**

Cloud Investments LLC dba Perfect Cloud Solutions  
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Cloud Investments LLC dba Perfect Cloud Solutions has not yet implemented STIR/SHAKEN, but does have robocall mitigation features in place.

### **Extension:**

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

### **Robocall Mitigation:**

On outbound calls, Cloud Investments LLC dba Perfect Cloud Solutions currently acts to prevent Robocalls.

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

Additionally, Cloud Investments LLC dba Perfect Cloud Solutions 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.
- Cloud Investments LLC dba Perfect Cloud Solutions' terms of service to not allow customers to resell services, and allow for immediate termination or call restriction when abuse is detected.

### **Traceback:**

Cloud Investments LLC dba Perfect Cloud Solutions 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.