



Robocall Mitigation Plan

Prepared by: NXTEP INTERNATIONAL, INC.

Effective Date: December 10, 2024

I. Overview

This plan outlines NXTEP INTERNATIONAL, INC.'s commitment and strategies to prevent the origination, processing, and transmission of illegal robocall traffic on our network. We adhere to the Federal Communications Commission (FCC) regulations, as outlined in 47 CFR § 64.6305, and ensure compliance with STIR/SHAKEN protocols and traceback requests.

II. Company Information

Business Name: NXTEP INTERNATIONAL, INC.

Business Address: 1571 FENPARK DRIVE, FENTON, MO 63026

III. Roles in the Call Chain

Service Type: Voice Service Provider

Network Role: Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users

IV. Commitment to Prevent Illegal Robocalls

A. Measures to Vet New and Renewing Customers:

1. Customer Screening:

- Conduct Know Your Customer (KYC) checks to verify identity and legitimacy.
- Require detailed documentation on intended use of services.
- Perform risk assessments for potential misuse of services for robocalling.

2. Prohibited Use:

- Explicitly prohibit illegal robocalling in customer contracts.
- Enforce immediate suspension or termination for non-compliance.

B. Continuous Monitoring:

1. Traffic Analytics:

- Deploy call analytics systems to monitor traffic for patterns indicative of illegal robocalling.
- Implement automated alerts for abnormal call volumes or duration metrics.

2. Call Blocking:

- Utilize blocking tools to prevent known or suspected illegal robocall traffic from originating on our network.

C. STIR/SHAKEN Implementation:

1. Verification:

- Certify compliance with STIR/SHAKEN protocols for call authentication on IP-based networks.

2. Call Labeling:

- Clearly label calls as verified or unverified to downstream carriers and consumers.

V. Procedures to Respond to Traceback Requests

1. Contact:

NXTEP INTERNATIONAL, legal@nxtep.com

- Available 24/7 to respond to traceback requests.

2. Response Protocol:

- Acknowledge traceback requests within 24 hours.
- Provide requested call details promptly and cooperate fully with the traceback process.

VI. Call Analytics and Monitoring

- Third-Party Vendors: Utilize reputable vendors for advanced call analytics.
- Fraudulent Call Identification:
 - Monitor flagged call patterns in real-time.
 - Suspend suspicious traffic and investigate further as needed.



VII. Upstream Provider Management

1. Selection Criteria:

- Work only with FCC-certified upstream providers.
- Require upstream providers to maintain a valid Robocall Mitigation Database (RMD) certification.

2. Monitoring and Accountability:

- Periodically audit upstream providers for compliance with robocall mitigation practices.
- Establish contractual obligations to support traceback efforts and prevent illegal robocalls.

VIII. Internal Compliance Measures

1. Employee Training:

- Conduct regular training sessions on robocall mitigation best practices and FCC regulations.

2. Audit and Oversight:

- Perform quarterly audits of network traffic and compliance efforts.
- Maintain logs of all actions taken in response to suspicious activities or traceback requests.

IX. Certification

NXTEP INTERNATIONAL, INC. certifies that all measures outlined in this plan are implemented to the best of our ability and in full compliance with FCC regulations.

X. Review and Update

This plan will be reviewed and updated annually or as required by changes in FCC regulations.