

ROBOCALL MITIGATION POLICY

Robocall Mitigation Compliance with TRACED Act Objective: Establish and follow a policy that is compliant with TRACED Act Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant. The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of New England VOIP, LLC, an interconnected VOIP provider.

I. Carrier Attestation

All calls made from our carriers are signed and they will provide attestation for outbound call services. Carriers can be provided upon request.

II. General Prohibition Against Illegal Robocalling

New England VOIP end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements. Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the New England VOIP service to engage in or in connection with fraudulent activities or robocalling.

End users are notified that New England VOIP may take action up to suspension or termination of service for violation of the TOS.

Know Your Customer

New England VOIP additionally utilizes the mitigation technique of "Know Your Customer." New England VOIP is a small, long established provider that maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and none of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing

us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

Traceback and Enforcement Cooperation

New England VOIP will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. New England VOIP will dedicate sufficient resources to provide prompt and complete responses to traceback requests