

Robocall Mitigation Program Description

VoiceNation LLC d/b/a Moneypenny

Overview

VoiceNation LLC, doing business as Moneypenny ("VoiceNation"), provides live telephone answering and call handling services for business customers throughout the United States. VoiceNation's services are designed to receive, process, and route inbound telephone communications on behalf of its customers. VoiceNation does not provide outbound telemarketing services and does not permit the use of its services for illegal robocalling, caller ID spoofing, or other unlawful telecommunications activities.

VoiceNation is committed to preventing the origination and transmission of illegal robocalls and maintaining compliance with applicable Federal Communications Commission (FCC) requirements.

Customer Due Diligence

VoiceNation maintains procedures to identify and validate customer accounts prior to activation of services. Customer information is reviewed to verify business legitimacy and intended service usage. VoiceNation reserves the right to request additional information from customers when necessary to confirm compliance with applicable laws and regulations.

Acceptable Use Policy

VoiceNation prohibits customers from utilizing its services for:

- Illegal robocalling activities;
- Caller ID spoofing in violation of applicable laws;
- Unsolicited telemarketing campaigns;
- Fraudulent, deceptive, or abusive telecommunications practices;
- Any activity prohibited by FCC regulations, the Telephone Consumer Protection Act (TCPA), or the Truth in Caller ID Act.

Violations may result in suspension or termination of service.

Traffic Monitoring and Fraud Prevention

VoiceNation monitors telecommunications traffic and account activity for indicators commonly associated with illegal robocalling or fraudulent activity, including:

- Unusual call volume patterns;

- Excessive short-duration calls;
- Rapid increases in traffic volume;
- Abnormal calling behavior inconsistent with the customer's stated business purpose; and
- Other indicators of potential abuse or fraud.

When suspicious activity is identified, VoiceNation may investigate the activity, request additional information from the customer, restrict service, suspend traffic, or terminate the customer relationship as appropriate.

STIR/SHAKEN Authentication

VoiceNation relies upon its underlying telecommunications carrier partners for implementation of STIR/SHAKEN caller ID authentication technology. VoiceNation works with carrier partners that support and implement FCC-approved caller authentication frameworks designed to reduce illegal caller ID spoofing and improve trust in telephone communications.

Cooperation with Traceback Efforts

VoiceNation cooperates with lawful requests from regulatory agencies, law enforcement authorities, carrier partners, and authorized industry traceback organizations investigating suspected illegal robocall activity.

VoiceNation maintains records and operational procedures necessary to assist in the identification and investigation of suspicious telecommunications activity when requested by authorized entities.

Employee Training and Compliance

Appropriate personnel are trained regarding robocall mitigation requirements, fraud prevention practices, customer onboarding procedures, and escalation processes for suspicious activity.

Ongoing Review

VoiceNation periodically reviews and updates its robocall mitigation procedures to address emerging threats, evolving industry best practices, and changes to applicable regulatory requirements.

Certification

VoiceNation LLC d/b/a Moneypenny certifies that it has implemented reasonable and appropriate practices designed to prevent the origination and transmission of illegal robocalls and to mitigate the risk of unlawful telecommunications activity utilizing its services.