

Robocall Mitigation Plan

HyperSurf Internet Services Inc.
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All customers who use HyperSurf Internet Services Inc. as a VoIP service provider are subject to the following rules regarding phone calls originating on the Trunks and DID's that are used on any system or device.

Know Your Customer

We obtain and verify customer information including physical business address, contact persons and the nature of the customers business. We also follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>.

Know Your Upstream Provider

HyperSurf Internet Services Inc. has two upstream providers.

QuestBlue Systems Inc.

Cebod Technologies LLC

HyperSurf Internet Services Inc. has a master service agreement with its upstream providers and has received assurances in writing from its officials that they have, and will continue to, sign calls transmitted/received to and from HyperSurf Internet Services Inc., and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to HyperSurf Internet Services Inc.,. HyperSurf Internet Services Inc and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Traceback

We respond and cooperate with all traceback requests from the FCC, law enforcement, and the registered traceback consortium.

Robocall Mitigation Plan

Robocall Mitigation Program

We use services provided by our upstream providers to monitor our outbound voice traffic to prevent the origination of illegal robocalls. We use no third-party service vendor. We have several safeguards in place to help stop and trace illegal robocalls.

- No Outbound calls can use an outbound caller ID that is different than a direct inward dialing number on the customer account.
- No calling from locations that are not specified as allowed ip address space
- No user agents that are used by robocallers.
- Blocking improperly formatted ANI numbers.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with an override to include original caller ID even when a call is determined fraudulent

In addition, we have implemented a Call Abuse Policy to our website and to our customer agreement.

“Any call originated on the HyperSurf Internet Services Inc. network is subject to inspection and investigation if the call is suspected of being fraudulent or abusive. Calls meeting any of these criteria will be blocked. If any condition is met the subscriber may be disconnected from the HyperSurf Internet Services Inc. network and may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.