

Voipia Networks, Inc.
3941 Park Drive, #20-133
El Dorado Hills, CA 95762

Robocall Mitigation Plan V4.1

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Voipia Networks submits this report on its implementation of the STIR/SHAKEN call authentication, and its plan to prevent and mitigate illegal robocalls.

Carrier STIR/SHAKEN Status:

Voipia Networks has implemented the STIR/SHAKEN authentication framework on its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using our service to originate illegal robocalls.

Voipia has not been prohibited from filing a certification in the Robocall Mitigation Database.

Voipia does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Traceback Requests:

Voipia Networks will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. Voipia keeps Call Detail Records for all incoming and outgoing calls. Voipia Networks is committed to fully and timely responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will continue to cooperate with such entities in investigating and stopping illegal robocalls that use Voipia Networks' services.

Traceback Request Single Point of Contact:

Name: Mark Millis II

Title: President

Phone Number: 916-293-5310

Email Address: bteam@voipia.net

Know your Customer: Vetting to prevent origination of illegal robocalls:

A Voipia customer is the end-user (the actual user of our phone service). Voipia does not sell our phone services to a Voice Wholesaler or a Voice Reseller. Voipia does not sell our services to a customer that uses RoboCall Dialing Software, and our customer Service Agreement (section 9) specifically tells our customers illegal calling is not allowed and offenders will be terminated.

All customers who utilize the Company's services are verified to have a physical address, and letters of authorization signed by verified officers, owners, or managers.

Voipia Networks has prepared and posted an Acceptable Use Policy which was designed to help protect Voipia, its customers and the Internet community in general from irresponsible or, in some cases, illegal activities. Voipia customers that deliberately break with our Acceptable Use Policy will have their phone services terminated. Voipia does not currently provide International Origination Services and/or provide phone numbers outside of the United States to domestic or international customers.

Know your upstream providers:

Voipia has established a long term relationship with a limited number of upstream providers.

Voipia's upstream providers are committed to monitoring their own networks and preventing the use of their networks for the transmission of illegal robocalls.

Upstream Provider Information:

Name of Upstream Provider : Lumen

Nature of Business: Wholesale Origination and Termination

Name of Upstream Provider : VoIP Innovations (Sangoma)

Nature of Business: Wholesale Origination and Termination

Name of Upstream Provider : IDT Telecom, Inc.

Nature of Business: Wholesale Origination and Termination

Ongoing Robocall Mitigation Practices:

As part of our Plan to mitigate and prevent any originating robocalls on our network, Voipia is committed to early identification and investigation of possible robocalling situations. In monitoring usage of its network, particular attention is given to: (1) higher than normal subscriber traffic volume including large bursts of traffic in small timeframes or inconsistent volumes of traffic (spikes in usage); (2) originating calls of short duration and low call completion percentages; (3) originating calls with sequential called to number dialing patterns; (4) repeated calls made to do not-call registry or invalid numbers; and (5) calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.

Call Analytics Vendor Name and Description of System:

Voipia uses call analytics to further assist and prevent the origination of illegal robocalls on our network. Voipia has contracted with TransNexus for the following analytical services:

Voipia utilizes the TransNexus "Analytics" to support the effectiveness of its Robocall Mitigation Plan. This includes, as examples, the use of "Telecom Fraud Prevention" and "Robocall and Telephone Denial of Service (TDoS) Prevention" services, which include more specifically the use of the following methods/tools as a means of preventing and blocking fraudulent and illegal robocalls on its network: the use of CDRs and related reports for determining mitigation actions; use of SIP Analytics enabling real time traffic analysis and detection and mitigation of robocalls at origination; use of blacklisting and whitelisting to mitigate calls with specific attributes; use of a "Shield" database that screens calls at origination for calling numbers that are invalid, high-risk, or appear on "Do Not Originate" lists; and use of reputation look up services on calling numbers at origination.

STIR/SHAKEN

We have registered with the STI-PA using OCN 021K. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.