

## Robocall Mitigation Policy Version 1

### Robocall Mitigation Compliance

NetTech, LLC

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Objective: Establish and follow a policy that is compliant with FCC's Robocall Mitigation Plan (RMP).

### 1. 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 FCC requires voice service providers to develop a Robocall Mitigation Plan that:

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

This mitigation plan is submitted on behalf of NetTech, LLC, a managed voice platform (UCaaS) used to manage the day-to-day business of the business customers in our region. Our platform includes voice service for appointment reminders, confirmations and account maintenance.

### 2. Our Mitigation Plan

- NetTech, LLC utilizes the mitigation technique of "Know Your Customer." NetTech is a Managed Voice provider and its customer base is mostly small and medium businesses in our local region. Our agents have ongoing relationships with them and meet often for training and support. Our business model is based on knowing our clients. All outbound call traffic is client event driven, transactional content based on appointment reminders and signed by our provider Bandwidth who is fully STIR/SHAKEN compliant.

- NetTech collects and verifies information for each of its clients such as physical business location, contact person(s), state or country of incorporation, and the nature of the customer's business.
- Our platform does not include large volume calling capability within our end-user service.
- We only allow event driven voice calls. For example, normal business calling such as appointment reminders, confirmations or account maintenance. We do not provide our customers any marketing channels for voice. Our voice communications are only transactional.
- We segment our customers on to separate numbers for efficient traceback and blocking. Our customers cannot change/sequence their number. Only NetTech, LLC agents have that authorization.
- We employee in-person education and training for our customers regarding NetTech, LLC best practices including all notification types.
- We have real-time reporting and analytics of all outbound, and inbound calls. This is a dashboard driven interface, not buried in our log files. It allows us to act quickly should we need to.
- We retain all inbound and outbound calling records for minimum of 6 months.

### **3. Traceback and Enforcement Cooperation**

NetTech Voice users do not have the capability to: generate a non-event driven robocall, provide altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call, however, we will actively cooperate with the traceback community including the FCC, law enforcement, and

The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. NetTech dedicates sufficient resources to provide prompt and complete responses to traceback requests.