

Automated call (Robocall) mitigation process

Westbay Engineers Ltd

Version 2
August 2023
For distribution to all staff

This process is applied to all new customers who require routes open to any of these destinations:

- United States of America
 - Canada
 - Australia
 - United Kingdom
 - European Union countries
-
1. Conduct a telephone or video call interview with a senior officer of the customer to establish the nature and source of the traffic to be terminated.
 2. Make a personal assessment of the likelihood that the customer will attempt to pass computer generated telephone traffic. Forward this to a Director of Westbay Engineers for approval. Traffic may not be passed by the customer until such approval is given.
 3. *Before being allowed to pass traffic, each customer is required to sign a service agreement that includes a commitment not to send computer generated voice traffic. (version 2, August 2023)*
 4. A network engineer will assess the traffic pattern five working days after the customer first passes traffic. If the network engineer is satisfied that the traffic has a normal human-generated pattern, no further action is taken. If the network engineer has doubts, the route is blocked and return to step 1.
 5. *All traffic is subject to the internally developed Robosniff application. This carries out an analysis of all traffic every twenty-four hours and raises an alarm if it suspects computer generated traffic is present. A network engineer will commence investigation of this traffic within twelve hours of such an alarm being raised and will conclude investigations twelve hours later. At that point, the network engineer will either have satisfied themselves that the traffic is not computer generated (and documented those findings) or will have suspended the traffic while further investigations take place. (version 2, August 2023)*
 6. Every three months **(version 2, August 2023)**:
 - a. An account manager will conduct a personal telephone call or video interview to confirm the customer's view of the nature of the traffic and remind the customer of Westbay Engineers policy of not tolerating computer generated traffic.
 - b. A network engineer will perform the analysis and actions described in step 3, analysing the previous fourteen days' traffic.
 7. At any time, network engineering will cooperate with any investigation requests from suppliers or telecommunications regulatory authorities.

