



WHYEQUALS, LLC | ROBOCALL MITIGATION PROGRAM

BACKGROUND

At WhyEquals, LLC, our voice services primarily cater to two main groups of callers: those interested in signing up for our service and those seeking customer support. In fact, 87% of all our call traffic comes from inbound calls, with a small portion of those being redirected to human operators at our call center, turning them into outbound calls. These outbound calls, comprising 9% of our total voice traffic, are only directed to two external numbers belonging to our employees who are trained to handle suspicious calls or abuse.

The remaining 4% of our voice traffic includes outbound calls related to billing or technical support, as well as voice alerts for specific end users and customers to whom we've resold voice services.

SPECIFIC REASONABLE STEPS TAKEN TO AVOID ORIGINATING ILLEGAL ROBOCALL TRAFFIC

To ensure that we operate responsibly and prevent the misuse of our services for illegal robocalls, we have implemented several measures:

- 1. Prompt Response to Traceback Requests:** We commit to responding fully and promptly to all traceback requests from regulatory bodies and law enforcement, cooperating with investigations to stop illegal callers within 24 hours.
- 2. Know-Your-Customer Policy:** We enforce a stringent policy to verify and understand our customers, including requiring full identification details and a clear understanding of their intended use of our services.
- 3. Implementation of STIR/SHAKEN:** We work with downstream providers to sign our outbound calls and have fully implemented STIR/SHAKEN protocols to verify caller identity.
- 4. Immediate Response to Security Breaches:** In the event of a security breach, such as compromised API keys or credentials, we promptly renew security credentials and investigate the source of the breach.
- 5. Prevention of Caller ID Blocking:** We disallow the practice of anonymizing caller IDs within our system to maintain transparency even though the practice is legal.
- 6. Restriction on Outbound Caller IDs:** Outbound caller IDs are limited to VOIP numbers purchased through us by our customers, ensuring consistency and preventing spoofing.
- 7. Restriction on Caller ID Origination:** Customers are limited to using the caller ID that they registered within our service, ensuring accountability in case of call forwarding.



8. Prohibition of Misleading Caller Identification: Our acceptable use policy strictly prohibits the transmission of misleading or inaccurate caller identification information with malicious intent per Truth in Caller ID Act of 2009.

9. Content Guidelines: We reject use cases containing content related to sensitive topics such as sex, hate, alcohol, firearms, or tobacco.

10. Review of Recorded Content: For customers requiring larger or automatic throughput, we review all recorded content before approval to ensure compliance with regulations.

11. Logging and Monitoring: We maintain comprehensive logs of all traffic and produce reports (analytics) to monitor for unusual activity, enabling us to detect and address potential misuse.

12. Collaboration with Downstream Providers: We work closely with downstream providers who also provide logs and usage statistics, enhancing our ability to monitor and mitigate misuse.

By implementing these measures, we are committed to preventing the origination of illegal robocall traffic and maintaining the integrity of our voice services.