



Robocall Mitigation Plan for Genie Innovations

1. Genie Innovations commits to respond to all requests for trace backs from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robo-callers that use its service to originate calls. Any request for information or directives from afore mentioned agencies will be responded to within 24 hours.
2. Genie Innovations has taken the following specific steps to detect originating robocall traffic:
 - a. Genie Innovations monitors systems for fraudulent activity by evaluating outbound Caller ID and high call volume. Call detail records are maintained to determine typical call volume. Originated calls made with off net phone numbers will be investigated for possible robocall activity. Clients suspected of making robocalls will be contacted as soon as suspicion is identified.
 - b. Genie Innovations verifies all clients to be legitimate business's and has direct contact with a live person.
 - c. Genie Innovations limits concurrent call levels for each client to appropriate numbers as indicated by call history.
 - d. Genie Innovations has direct control of all PBX's and gateways connected to our network and will reject calls with improper Caller ID.
 - e. Genie Innovations requires all service providers to deploy a STIR/SHAKEN solution. Service providers will have network elements in place to filter the incoming and outgoing calls to mitigate robocalls of Genie Innovations network.
 - f. Establishing a single Point of Contact (along with backups) for our robocall mitigation program.
3. Genie Innovations has taken the following steps to prevent illegal originating robocalling traffic.
 - a. Full customer compliance to refrain from placing unsolicited phone calls or represent another company/individual/services
 - b. IP address banning based on suspected system intrusion
 - c. Customers have disclosed full contact information
4. Genie Innovations will take the following steps to mitigate originating robocalling traffic upon detection:
 - a. Notify customer of suspected robocall activity.
 - b. Require customer to cease any robocall activity.
 - c. Terminate customers originating capabilities if customer does not cease robocall activity.
 - d. Genie Innovations will implement FCC required rules as they are defined.