

ROBOCALL MITIGATION PLAN FOR SPHEREXX LLC

BUSINESS INFORMATION

Spherexx LLC
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CONTACT INFORMATION

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OVERVIEW

Spherexx has one upstream provider from which it receives voice services:

Bandwidth Inc
900 Main Campus Drive
Suite 100
Raleigh, NC 27606

Spherexx has a master service agreement with Bandwidth Inc and Bandwidth Inc makes assurances that traffic sent over its network are and will continue to be in compliance with STIR/SHAKEN.

Spherexx also implements its own separate Robocall Mitigation Plan, outlined in this document.

Additionally, USAC has informed Spherexx that it is not obligated to register for a 499 Filer ID based on the information provided to USAC, and Spherexx has filed a 499 Deactivation Form with USAC.

PLAN SPECIFICS

1. **Gated access**

Spherexx LLC (Spherexx) does not directly interface with any telephony infrastructure. Spherexx utilizes the services of its upstream partner, Bandwidth Inc, who provides web-based API functionality. The upstream partner has their own mitigation plan and STIR/SHAKEN implementation. Spherexx cannot create any voice telephony events without interacting with the upstream partner network and thus being subject to the upstream partner's mitigation plan. All telephony service events originate from within the upstream partner network as a result of their translation of non-telephony events (http requests) initiated by Spherexx.

2. **No automated calls**

Spherexx does not have any process devised or implemented to autogenerate outbound calls. All outbound calls are generated by human agents working for customers of Spherexx services taking a direct and intentional action in Spherexx software systems.

3. **Customer identification**

All Spherexx customers are identified by account controls such as account name and account identifier and each account is associated with an operating business. All agents of Spherexx customers operating Spherexx services are identified by login name and IP address and each login is identified with a specific employee. All customers must be a subscriber of Spherexx services and must submit identifying information, such as: Business type, full legal entity name, year formed, state of incorporation, physical operating address, telephone number, website, marketed name, etc.

4. **Prevention**

Spherexx has made reasonable effort to secure access to the software functionality that creates outbound calls via upstream partners. These efforts include controlled employee access, utilization of secret tokens provided by service providers, login credential verification when attempting to trigger an outbound call, securing the HTTP communications while in transit, IP blocklists, and limiting the outbound call functionality to a specific embedded logic tree.

5. **Detection**

Outbound calls are logged and accessible from searchable internal reporting, as well as third party service provider reports. In addition, there are automated monitors for abnormal outbound call volumes and call failures. Procedures used to investigation abnormal activity may include but are not limited to: determining if any software or system issue generated the activity, verifying the actions taken to originate the events, communicating with our subscriber to understand their intentions and verify the activity belongs to them, checking subscriber account activity, and benchmarking activity against historical and expected trends.

6. **Remediation**

Outbound call functionality can be restricted per user. User accounts can be disabled. IP addresses can be blocked. Incidents can be escalated to third party service providers for remediation.

STATEMENTS

1. **Commitment**

Spherexx is committed to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. Spherexx pledges to cooperate with such entities to investigate and stop any illegal robocallers that originate from Spherexx services.

2. **History**

At no point in time has Spherexx been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

SIGNATURE

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