

Legent Comm LLC
Robocall Mitigation Plan

Updated: February 2024

Introduction

This document details the steps taken by Legent Comm LLC (“Legent” or “Company”) to avoid originating illegal robocalling.

Legent is a switchless long distance (interexchange carrier) reseller and does not own or control facilities that would enable it to implement the STIR/SHAKEN authentication framework but relies on underlying facilities-based interexchange carriers to ensure compliance with the STIR/SHAKEN framework. This includes any Caller ID features for SIP calls required under §64.6301. As a long distance provider, Legent does not provide customers with telephone numbers. The Company qualifies for an exemption from the requirements of §64.6301 under §64.6304(b), because as a switchless long distance reseller, it is incapable of obtaining an SPC token.

Know Your Customer

Legent employs a variety of “know-your-customer” initiatives to help mitigate the risk that its customers would attempt to use, either intentionally or unintentionally, Legent’s services to facilitate an illegal robocalling campaign. Legent makes reasonable, good faith efforts to validate the identity of its customers, particularly smaller customers that may be more susceptible to identity theft. For existing customers, Legent monitors traffic patterns for potential illegal robocalling or spoofing. For new customers these measures include, but are not limited to, performing a credit check; requiring customers to demonstrate that they are a legitimate business entity if they are not among the following: a Fortune 500 company, a public company, a state or federal government agency or a major state university. These initiatives are integral to mitigating identity theft risks and maintaining network integrity.

Traceback Requests

Legent is committed and will respond fully within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Consortium and will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. Legent will devote sufficient resources to provide prompt and complete information to traceback requests. The Company’s point of contact to handle all traceback requests is:

Scott White

Operations Manager

Phone : 949-753-7000

traceback@legentcom.com

If a traceback identifies an existing customer as the source of illegal robocalls, Legent will contact the customer for an explanation and verification that the traffic will be discontinued. Legent will

monitor the customer's traffic and if the fraudulent traffic is not discontinued, it will immediately discontinue service to the offending customer.

Telephone Numbers

As a long distance reseller, Legent does not issue telephone numbers.

International Calling

Legent is not an international voice services provider and does not have plans to become one.

Ongoing Robocall Mitigation

Legent has implemented comprehensive policies to prevent misuse of its services for illegal activities, including spoofing or robocalling campaigns. These policies aim to accurately identify and understand new and existing customers and their traffic patterns, thereby managing risks associated with unlawful traffic. Legent monitors the calling patterns of its customers on a regular basis. When a potential illegal activity such as spoofed or robocalling is identified, Legent immediately blocks further calling and investigates to determine if such calling pattern is legal and within the normal course of business for its customer. The objective of this policy is to prevent Legent from being used, intentionally or unintentionally, for spoofed or illegal traffic. In addition, know your customer procedures described above enable Legent to identify and understand customers, which in turn helps Legent prevent unlawful traffic.