



594 West Main Street
Danville, IN 46122

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Caylor Communications, Inc. D/B/A One Choice Technology (“One Choice”), is an IT Managed Services Provider offering Cloud Hosted access to our Voice over IP telecommunications system to the SME market based in Danville, IN, serving fewer than 10,000 voice subscriber lines. One Choice is in compliance with a complete STIR/SHAKEN Implementation and certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a),

One Choice has implemented the following Robocall Mitigation Plan. All voice traffic on the One Choice network is subject to the following parameters.

Robocall Mitigation Plan

What follows are the specific reasonable steps One Choice has taken to avoid originating illegal robocall traffic.

Overview

The Federal Communications Commission (FCC) has adopted rules requiring voice service providers to implement STIR/SHAKEN Caller ID authentication technology in their network.

The FCC is requiring all providers to certify in the Robocall Mitigation Database that they have taken the necessary steps to fully implement STIR/SHAKEN or have developed a Robocall Mitigation plan to ensure that they are not originating illegal robocalls.

The FCC requires that all voice service providers develop a plan that:

- Details the reasonable steps taken to avoid illegal robocalls
- Provide a commitment to cooperate with traceback requests
- Cooperates with investigations focused on stopping illegal robocalls
- File in the Robocall Mitigation Database

The Commission has stated that a mitigation plan is sufficient if the detailed plan can “reasonably be expected to reduce the originating illegal Robocalls”.

Purpose

One Choice is committed to stopping originating robocalls on our network

Business Operations

One Choice offers Voice over Internet Protocol (VoIP) service through product channels such as; Hosted, App's. Our customer base is the small – medium size business market.

STIR/SHAKEN Compliance Status

One Choice operates 3CX and Vital VoIP platforms integrated with a STIR/SHAKEN solution by Bandwidth.com. One Choice is in compliance with a complete STIR/SHAKEN Implementation. One Choice certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. The filer also certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2).

Know Your Customer

Accurate identification of a subscriber in the STIR/SHAKEN platform ties directly to a telephone number and the Caller ID associated with that number. One Choice defines a subscriber as a customer who has a business relationship with One Choice in which originating and terminating of calls takes place.

As part of our relationship with that customer, One Choice requires the following information to verify all new customer:

- Name
- Physical Address
- Federal Tax ID
- Contact Individuals (name/number)
- Type of Business
- Signed Contract

Terms of Service

One Choice has added a provision to its Master Service Agreement which states that voice service customers that are identified as violators of the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act will potentially be subject to enforcement actions by the FCC, appropriate law enforcement, and termination of service.

Telephone Number Authorization

One Choice defines Telephone Number as an originating phone number including call signaling used to identify the caller for call screen purposes. A number used for caller identity may or may not be associated with the subscriber's account.

One Choice currently obtains numbers from underlying carriers. One Choice tracks number assignment and monitors these numbers.

In those cases where a subscriber wishes to use a number as a caller identity and the number is not managed by One Choice, then number validation is required. One Choice will require a Letter of

Authorization (LOA) that the customer is the authorized user of that number. One Choice will check calls originating with this number. Subsequently One Choice will check the calling party number against our inventory and will not attest the call unless the calling party number is a number that has been validated.

Monitoring

One Choice monitors traffic patterns and statistics such as Originating Customer, Terminating Destinations, ASR, ALOC, and short call percentages to ensure the network has not been compromised. Abnormal behavior is escalated to the offending customer and blocked until the customer has rectified issues.

Investigation and Traceback

One Choice has implemented industry best practices and; cooperates in traceback and trace forward investigations. One Choice provides timely and dedicated resources when a traceback request is received. To date, One Choice has not received any traceback request.

One Choice will investigate suspicious activity and activity reported by third-party identifiers. Investigation could lead to opening a traceback request, contacting a subscriber or blocking if the subscriber does not respond. One Choice is requiring that all subscribers cooperate with traceback investigation by identifying upstream provider from which the illegal robocall entered our network

One Choice will respond to all traceback requests in a timely manner. Carriers may contact the OCT Support Center at support@onechoice.tech or +1 317-563-7055.

Call Blocking

When investigation identifies suspected Robocalling patterns that are suspicious, One Choice will take necessary action, which could include suspension or terminating the subscriber from the One Choice network.

One Choice has capabilities to block calls based on Caller ID, Trunk Group and IP address. Blocking is currently a manual process with ongoing efforts to integrate systems with service providers able to provide automatic blocking.

Plan Updates

This is an evolving response to the Robocall STIR/SHAKEN requirements. One Choice will monitor industry best practices and continuously improve our internal processes to ensure this plan and our systems adapt to ever-changing issues. In the event of any material changes to this plan, One Choice will republish this plan to its employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database.