

Robocall Mitigation Plan for Innovat Solution

1. Introduction and Policy Statement

- **Objective:** Commit to preventing the origination of illegal robocalls through our network and services.
- **Scope:** This plan covers all outbound calls facilitated through Bandwidth's fully STIR/SHAKEN capable services.

2. STIR/SHAKEN Compliance

- **Status:** All our traffic is routed through Bandwidth's services which are fully compliant with STIR/SHAKEN standards.
- **Coordination:** Continue to work closely with Bandwidth to ensure any updates or changes in services maintain compliance.

3. Monitoring and Analysis

- **Tools and Procedures:** Utilize Bandwidth's monitoring tools to review traffic patterns and identify potential robocall activity.
- **Thresholds for Action:** Establish specific criteria for what constitutes suspicious activity warranting further investigation or immediate action.

4. Caller Authentication

- **Implementation:** Leverage Bandwidth's STIR/SHAKEN capabilities to authenticate caller identities to prevent spoofing and fraudulent activities.
- **Verification Procedures:** Ensure all outbound calls are verified under the STIR/SHAKEN framework to maintain trust in caller identity.

5. Mitigation Measures

- **Call Blocking:** Use Bandwidth's protocols for blocking calls identified as potential robocalls based on analytics and STIR/SHAKEN verification failures.
- **Incident Response:** Implement procedures for rapid response to alerts on suspicious call activities

6. Customer Education and Awareness

- **Information Campaigns:** Regularly inform customers about how to identify and report suspected robocalls.
- **Resources and Support:** Provide resources that help customers use features like call blocking and reporting to combat robocalls.

7. Complaint Handling

- **Process:** Outline steps for customers to report suspected robocalls, including how to contact support and what information to provide.
- **Resolution Steps:** Detail the process for investigating customer complaints and the timeline for resolving issues.

8. Training and Internal Compliance

- **Staff Training:** Ensure that all relevant staff are trained on the implications of STIR/SHAKEN and the company's policies on robocall mitigation.
- **Compliance Audits:** Conduct periodic audits to ensure all practices comply with FCC regulations and company policies.

9. Plan Review and Updates

- **Regular Review:** Schedule semi-annual reviews to update the plan based on technological advances and regulatory changes.

From: Ryan Henley <ryan@reply.bandwidth.com>
Sent: Tuesday, February 22, 2022 11:00 AM
To: billing@innovatsolution.com
Subject: Your traffic is fully supported

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Customer,

Bandwidth has long been a vocal advocate and an early adopter of STIR/SHAKEN to prevent robocalling. We have engaged with the FCC and other industry members for years to help our customers be aware of and prepare for this necessary regulation and help solve this nuisance to society.

The vast majority of all of Bandwidth's services and traffic are fully STIR/SHAKEN capable and only a small fraction of our customers utilize the legacy equipment that is at the center of this matter. The accounts on the legacy equipment will be migrated to fully capable STIR/SHAKEN services as soon as possible.

You are NOT one of those customers. Your traffic is fully supported by Bandwidth's STIR/SHAKEN capabilities.

Bandwidth has robust procedures to prevent robocalling, including screening potential customers and monitoring traffic. We are proud to lead the industry in protecting consumers from unwanted traffic and appreciate your support along the way.

If you have any questions, please feel free to contact our support teams by opening a [support ticket](#).

Warmly,

Ryan Henley

Chief Customer Officer

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