

1. INTRODUCTION

- 1.1 This Robocall Mitigation Plan has been prepared by Six Degrees Technology Group Limited and its affiliates ("Six Degrees") in compliance with the FCC's requirements to prevent and mitigate illegal robocalls.
- 1.2 Six Degrees, an English private limited company, is a provider of voice, colocation, connectivity, cloud, cyber security and related management services.
- 1.3 Six Degrees provides communication services to enterprise customers located in England, Europe, the USA and other international locations. As part of these services, Six Degrees resells US phone numbers which are used nomadically. Six Degrees originates and terminates calls within the UK, originates and terminates calls within the USA and internationally, as well as transports foreign originated traffic for termination into the United States or in other in foreign jurisdictions.
- 1.4 Six Degrees is committed to implementing robust strategies to identify, block, and report illegal robocall activities in accordance with this Robocall Mitigation Plan.
- 1.5 Contact Information:

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2. STRATEGIES FOR IDENTIFYING AND BLOCKING ILLEGAL ROBOCALLS

- 2.1 Six Degrees is working towards the implementation of the STIR/SHAKEN framework to authenticate caller ID information for all IP-based voice calls. As soon as Six Degrees has completed the prerequisite requirements to register with the Secure Telephone Identity-Policy Administrator ("STI-PA") and to obtain an Service Provider Code ("SPC") token, Six Degrees will obtain a certificate from a Secure Telephone Identify-Certification Authority ("STI-CA"), which will be activated and applied to Six Degrees calls through a third party authentication provider, pursuant to Six Degrees' agreement with Bandwidth.com for such service. As such time, Six Degrees will authenticate all calls originating on its network, becoming compliant with the STIR SHAKEN requirements.
- 2.2 Six Degrees does not use third party vendors to perform call analytics on its network. Six Degrees' employees perform network monitoring or analysis internally. The internal investigation process is triggered when the call rate exceeds one of the relevant alarm thresholds or when anomalies are identified following the daily dashboard monitoring activities.



- 2.3 While Six Degrees does not currently have the ability to do any sort of algorithmic or predictive blocking of nuisance calls, it is investigating this capability and may deploy a solution in the future.
- 2.4 Caller ID databases are regularly updated and maintained to ensure accuracy and reliability. Caller ID information is verified and spoofed or invalid numbers are restricted from originating from the network.

3. KNOW YOUR CUSTOMERS

- 3.1 Six Degrees verifies the identity of all its corporate customers at the point of onboarding, including reviewing of information such as the customer's registered office location, contact information, and credit worthiness.
- 3.2 Six Degrees includes language in its agreements, and policies prohibiting the use of its service for illegal activities, as well as reserving the right to disconnect the relevant services in the event of a breach.
- 3.3 Six Degrees performs caller ID authentication and only provides communication services to authenticated customers, subject to the terms of written agreements.
- 3.4 Six Degrees does not currently utilise any specific system to collect information related to customers' physical locations within the US or in other foreign jurisdictions, however such information is collected internally by Six Degrees employees as and when required for compliance purposes.

4. KNOW YOUR UPSTREAM PROVIDER

- 4.1 Six Degrees has a vetting process for upstream providers that send voice traffic to Six Degrees, requiring such providers to have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers and a reasonable process to identify suspicious traffic.
- 4.2 Six Degrees develops an understanding of an upstream provider's role in the call path for the traffic they will send and uses this information to understand whether Six Degrees will be obligated to authenticate unsigned traffic that it may receive.
- 4.3 Six Degrees currently only receives voice traffic from one upstream provider, Bandwidth.com, which is also Six Degrees' third-party provider for US numbers and which is registered in the Robocall Mitigation Database and is fully compliant with the STIR/SHAKEN obligations.
- 4.4 Because Six Degrees only received voice traffic from one upstream provider, Bandwidth.com, which only sends voice traffic to Six Degrees over SIP trunks and pursuant to its STIR SHAKEN certificate, Six Degrees does not receive unsigned SIP traffic from an upstream provider. Six Degrees' agreement with Bandwidth.com prevents Bandwidth.com from sending Six Degrees any traffic that is illegal.
- 4.5 If Six Degrees were to find that an upstream provider was sending suspicious robocalls to Six Degrees, Six Degrees would warn the upstream provider to stop such activity and if such activity continued then Six Degrees would terminate the service arrangement.



5. TRACEBACK AND PROCEDURES FOR REPORTING SUSPICIOUS ACTIVITY

- 5.1 Six Degrees will respond within 24 hours to all traceback requests from the FCC, law enforcement, and the registered traceback consortium. Six Degrees will cooperate fully with such entities in investigation and stopping any illegal robocallers that use Six Degrees' service to originate, carry, or process illegal robocalls.
- 5.2 Six Degrees is committed to reporting identified illegal robocall activities to the FCC and other relevant authorities in a timely manner. If required, Six Degrees can provide detailed information, including call logs and analysis, to assist in regulatory investigations.
- 5.3 Customers are encouraged to report suspected illegal robocalls and to provide feedback to enhance detection algorithms and improve overall mitigation strategies. All complaints related to robocalls are investigated to ensure swift action, including service suspension or termination, when violations are confirmed.

6. TECHNICAL AND OPERATIONAL DETAILS

- 6.1 Six Degrees utilises telecommunications infrastructure suitable to support advanced call monitoring and blocking capabilities.
- 6.2 Six Degrees is committed to participate in industry efforts and shares intelligence with other providers and law enforcement agencies to enhance robocall mitigation effectiveness.
- 6.3 The relevant members of staff are provided with training on robocall mitigation techniques and regulatory compliance.
- 6.4 This robocall mitigation plan will be reviewed and updated to incorporate new technologies and regulatory changes.

7. CONCLUSION

- 7.1 Six Degrees is dedicated to combating illegal robocalls and ensuring compliance with FCC regulations. This plan outlines our comprehensive approach to identifying, blocking, and reporting illegal robocall activities. We remain committed to protecting our customers and maintaining the integrity of our telecommunications services.