

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
September 28, 2021	BENEMEN OY	Initial Version
April 3 rd , 2024	ENREACH OY	Updated Version

Objective:	Establish and follow a policy that is compliant with TRACED Act
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I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- ✓ details the reasonable steps taken to avoid originating illegal robocalls
- ✓ demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- ✓ is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of ENREACH, a provider of telephony services based in Finland, serving customers in Nordics.

ENREACH is a service provider with SIP services in its network and we believe we fulfill the requirements together with our partners DIDWW and Bandwidth whose voice network and solution capabilities are used to manage our U.S numbers and in/bound traffic in U.S.

II. General Prohibition Against Illegal Robocalling

ENREACH end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

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- ✓ providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- ✓ violating any applicable local, state, or federal law; using the ENREACH service to engage in or in connection with fraudulent activities

In addition, the company is reviewing its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

ENREACH's end users are notified that ENREACH may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

ENREACH utilizes the mitigation technique of "Know Your Customer." ENREACH is an established provider in Finland that only accepts customers if sufficient verifiable information is available, such as Finnish tax ID and Chamber of Commerce registration. The customers are mostly small & medium sized companies in Nordics that usually have predictable call patterns, allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

ENREACH has set a call path level based on its average customer size. The level – referred to as "large volume calling capability" – is subject to change.

ENREACH has a screening for new customers requesting service at or above large volume calling capability levels:

- ✓ We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential;
- ✓ Businesses must provide a tax ID and verification as to the nature of the business;
- ✓ We verify addresses to look for overlapping / multiple deployed voice path subscriptions;

IV. Network Monitoring

ENREACH is continuing development of custom software in-house that allows for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability is being added to the software which will automatically disable any subscribers associated with flagged call patterns.

V. Traceback and Enforcement Cooperation

ENREACH will actively cooperate with the traceback community including the FCC and law enforcement to investigate and stop illegal robocalls. ENREACH will dedicate sufficient resources to provide prompt and complete responses to traceback requests.