



Robocall Mitigation Plan

Company Name: Waddell Solutions Group, LLC

Company Address 1717 Dixie Hwy, Ste 645, Ft Wright, KY 41011

Company Phone #: Office: 859-818-0000 24x7 NOC: 855-974-0000

Pursuant to 47 C.F.R. § 64.6305, Waddell Solutions Group, LLC submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Waddell Solutions Group, LLC has in place to mitigate illegal robocalls as of June 30, 2022. Waddell Solutions Group, LLC may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

As of June 30, 2022, Waddell Solutions Group, LLC has SIP traffic on its network. The current status of its STIR/SHAKEN implementation is:

- ☒ My traffic is fully attested.
- ☐ My traffic is partially attested.
- ☐ None of my traffic is attested yet

Waddell Solutions Group, LLC has implemented the following robocall mitigation plan to address unlawful robocall traffic:

- Reviewed current customer accounts to ensure compliance regarding originated traffic.
- Established extended reviews for new customer on-boarding to ensure traffic being originated is compliant.
- Instituted additional analytical monitoring of call traffic to detect anomalies from customer baseline.
- Full attestation of STIR/SHAKEN per FCC rulings of all traffic originated from it's network.

Waddell Solutions Group, LLC has enforceable terms of use and acceptable use policies noted in its contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company confirms the following information for its customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls

- Service Address
- Credit History

When the customer is a business, Waddell Solutions Group, LLC also requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

Waddell Solutions Group, LLC has established methods and procedures to monitor its network and detect / prevent fraudulent activity. The company uses call authentication, call labeling, and call blocking services to protect its networks and consumers from harmful calls. It also uses software to monitor its network's daily usage and has established methods and procedures in place to address issues as soon as they are identified.

Waddell Solutions Group, LLC will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Waddell Solutions Group, LLC has designated an individual as a dedicated point of contact for addressing traceback requests. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>. Waddell Solutions Group, LLC will respond promptly to inquiries from the Industry Traceback Group (ITG).

If a pattern of questionable activity is detected Waddell Solutions Group, LLC will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated. Requests from the ITG must be submitted in writing and include the following information:

Company Name:
Company Address:
Requestor's Name:
Requestor's Title:
Requestor's phone number:
Requestor's e-mail:

Waddell Solutions Group, LLC will cooperate with state and federal regulators to prevent any and all illegal robocalls. Requests from the valid agency must be submitted in writing and include the following information:

Law Enforcement Agency Name:
Agency Address:
Requestor's Name:
Requestor's Title:
Requestor's phone number:
Requestor's e-mail:

Waddell Solutions Group, LLC will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal

robocalls and suspicious activities, and implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.