

Robocall Mitigation Plan — West One, LLC

1. Company Information

Company Name: West One, LLC

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FRN: 0031446479

Operating Regions: United States

West One, LLC operates a private, internal-use voice system exclusively for employees. The Company does not sell, lease, or provide voice services to outside customers.

2. STIR/SHAKEN Status

West One, LLC operates network components that are not fully IP-based, and therefore cannot yet directly implement STIR/SHAKEN authentication on its internal phone system. Outbound PSTN calls are delivered to the Company's carrier partner, VoIP.ms, who applies STIR/SHAKEN where technically feasible. West One, LLC therefore claims the technical-limitation extension under 47 CFR § 64.6304 until remaining non-IP components are upgraded to enable full STIR/SHAKEN implementation.

3. Know Your Customer (KYC) Procedures

West One, LLC has no external customers. All users of the Company's voice system are employees whose identities are verified through HR onboarding procedures.

KYC controls include:

- Identity verification during employee onboarding
- Provisioning of voice system credentials only for verified employees
- Immediate deactivation of access upon employee separation
- No external third parties permitted to originate calls

These procedures apply to all new and existing internal users.

4. Third-Party Analytics and Monitoring

West One, LLC uses its carrier, VoIP.ms, as a third-party analytics vendor. VoIP.ms provides:

- fraud detection and traffic monitoring
- anomaly and high-risk call alerts
- rate-limit enforcement and risk scoring
- upstream filtering and analytics prior to PSTN termination

These analytics assist the Company in identifying unusual or potentially unlawful call behavior.

5. Mitigation Practices

The Company employs multiple mitigation steps to prevent unlawful robocalls, including:

- Voice origination restricted to authenticated internal employees
- Outbound PSTN calling limited to job-based need
- Use of VoIP.ms analytics to detect anomalies
- Monitoring of internal FreePBX logs and call patterns
- Blocking unauthorized routes and enforcing IP restrictions
- Investigating any flagged activity promptly
- Full cooperation with traceback requests
- Suspension or revocation of access if misuse is detected

6. Risk Assessment

Because all users are authenticated employees and the Company does not provide service to external customers, West One, LLC presents minimal risk of originating unlawful robocalls. Internal identity management, strict access controls, and third-party analytics further reduce risk.

7. Certification

I certify under penalty of perjury that the above mitigation practices have been implemented and that West One, LLC has taken all reasonable steps to prevent unlawful robocall origination.

Signed: Torrie Hughes

Torrie Hughes

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