

USVoIPSols LLC Robocall Mitigation Plan

The following documentation is to serve as the Robocall Mitigation Program of USVoIPSols LLC and their ongoing compliance with the Traced Act required by Section 4(b)(5)(C) of the TRACED Act, and 47 C.F.R. §64.6305

Exemption for STIR/SHAKEN

USVoIPSols LLC falls under the criteria delineated within the ambit of a Small Voice Service Provider as prescribed under Section 64.6304(a)(2) of the Commission's regulations, specifically 47 C.F.R. § 64.6304(a)(2), by catering to a clientele comprising fewer than 100,000 voice service subscriber lines. However, presently lacks dominion over the requisite network infrastructure imperative for the implementation of STIR/SHAKEN.

Know Your Customer

USVoIPSols LLC maintains a rigorous "know your customer" process, specifically designed to prevent new and renewed customers from using their network to originate illegal calls. USVoIPSols diligently scrutinizes new and recurring clientele desiring access to high-volume origination services and, when deemed requisite and feasible, adjusts service terms and conditions to mitigate the probability of any new or recurring customer initiating illegal robocalls.

Know your Upstream Provider

Prior to onboarding a new upstream provider, USVoIPSols LLC conducts a thorough due diligence assessment. This evaluation encompasses the gathering of pertinent business demographic data and contact details. In instances where an upstream provider exhibits a recurring trend of dubious conduct, the provider is mandated to rectify the issue promptly. Failure to address such concerns may result in the suspension and/or termination of services provided by said upstream provider.

Robocall Mitigation

1. **Specific reasonable steps to avoid originating, carrying, or processing illegal robocall traffic:** USVoIPSols LLC employs a multifaceted approach to mitigate the origination of illegal robocall traffic. These steps include:
 - USVoIPSols LLC only permits traffic originating from dedicated PBX servers that are fully configured and managed by us. These servers provide restricted access to end users, ensuring they cannot modify any configurations related to changing caller id, create predictive dialing campaigns, or initiate robocalls.
 - We also monitor and filter traffic for known robocall patterns such as high call volumes, consecutive calls to non-responding numbers, and irregular calling patterns.
 - Collaborating with upstream providers to ensure compliance with robocall mitigation practices.
 - Maintaining a blacklist of known bad actors and rapidly blocking these sources from originating calls on our network.

2. Compliance with "Know Your Customer" (KYC) and upstream provider obligations:

USVoIPSols LLC ensures compliance with KYC requirements by:

- Scrutinizing customer accounts for signs of fraudulent behavior, including identity verification and validation of business details for high-volume customers.
- Regularly reviewing customer call patterns to detect and prevent the origination of illegal robocalls.
- Performing due diligence on all upstream providers, ensuring that they also adhere to industry standards for robocall mitigation. Any new upstream providers undergo a thorough background check before service agreements are signed.

3. Analytics system(s) used to identify and block illegal traffic: USVoIPSols LLC employs the following systems to identify and block illegal robocalls:

- USVoIPSols LLC works with its upstream carriers having full STIR/SHAKEN deployments to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If USVoIPSols detects a calling pattern consistent with illegal robocalls, we will identify the party and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our system

Traceback Request

USVoIPSols LLC commits to respond to all traceback requests within 24 hours from the FCC, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls, and that all voice traffic that originates on its network is subject to this robocall mitigation program

Contact Information for traceback:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Certification

I, [REDACTED] of USVoIPSols LLC, do hereby certify, under penalty of perjury, the following:

- (1) USVoIPSols LLC falls under the criteria delineated within the ambit of a Small Voice Service Provider as prescribed under Section 64.6304(a)(2) of the Commission's regulations, specifically 47 C.F.R. § 64.6304(a)(2), by catering to a clientele comprising fewer than 100,000 voice service subscriber lines. However, presently lacks dominion over the requisite network infrastructure imperative for the implementation of STIR/SHAKEN,
- (2) USVoIPSols LLC has no other business names in use and has not previously used any other business name.
- (3) Owners of USVoIPSols LLC has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (4) The details of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (5) USVoIPSols LLC role in the call chain is that of a voice service provider without STIR/SHAKEN obligation.
- (6) USVoIPSols LLC has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (7) USVoIPSols LLC is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Principal(s) Information:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Affiliates and Subsidiaries:

- USVoIPSols LLC does not currently have any affiliates or subsidiaries.

Parent Companies:

- USVoIPSols LLC does not have a parent company.

[REDACTED]