

Waterfield Technologies

Robocall Mitigation Plan Introduction

Consistent with the rules and regulations of the Federal Communications Commission the following Robocall Mitigation Plan details the policies and practices that Waterfield Technologies (Waterfield) has established to prevent unlawful robocalls from originating on its voice network. This document sets forth Waterfield's Robocall Mitigation Plan in these sections:

Customer onboarding

Implementation of contractual terms and policies

Monitoring outbound network traffic

Investigating suspicious calls

Cooperating in traceback requests

Designating a responsible person responsible for addressing robocall- mitigation-related issues

Identification of STIR/SHAKEN Extension Category

Waterfield Technologies

Robocall Mitigation Plan

Waterfield customer onboarding includes robocall mitigation procedures.

Waterfield technical account managers onboard customers with multiple personal interactions across a variety of both customer and Waterfield team members. Customers are onboarded using an invoice system that may require credit checks, physical mailing address, full legal names, valid email address and validly assigned phone numbers. Customers pay invoices through reputable, verifiable vendors using traceable methods.

Waterfield has Policies in Place to Mitigate Origination of Illegal Robocalls.

Waterfield has also implemented contractual terms and policies that will mitigate the origination of illegal robocall traffic from its platform. These terms and policies are outlined in standard contractual terms with its customers and in customer Acceptable Use Policy (AUP).

These provisions include:

Express Prohibition on Fraudulent Use of the Services. Waterfield standard contract and AUP include provisions that prohibit the use of the services by any customer for fraudulent, deceptive, misleading or abusive activity.

Express Prohibition on Sending Unsolicited Messages. Waterfield standard contract and AUP include provisions that prohibit the use of the services to generate, distribute, or facilitate unsolicited mass messages.

Contractual Obligations to Comply with All Federal and State Laws. Waterfield standard contract terms and AUP place an affirmative obligation on its customers to comply with all applicable United States federal and state laws.

Acceptable Use Policy (available at: [\[REDACTED\]](#)).

Robocall Mitigation Plan

Contractual Validation of Caller-ID. Waterfield validates the caller-ID values that any of its customer will use, including confirmation that each number is either assigned directly to the customer, or used with the explicit permission of the assignee. Specifically, Waterfield obtains a Letter of Authorization from each customer certifying the numbers they will use as caller ID as owned by them.

Contractual Obligations to Obtain and Maintain Called Party Consent.

Waterfield standard contractual terms require its customers to:

- 1) obtain and maintain legal permission or consent from parties contacted by the customer
- 2) only contact those parties who the customer is legally permitted to contact
- 3) only contact those authorized parties in the manner legally permitted.

Waterfield Analyzes and Monitors Its Outbound Network Traffic.

Waterfield also has policies and procedures governing the analysis and monitoring of its outbound voice traffic. Consistent with Anti-Robocall Principles for Voice Service Providers, Waterfield analyzes voice network traffic originating from its network to identify and monitor patterns consistent with illegal robocalls.

Waterfield has policies and procedures in place to analyze and monitor its network on a twenty-four-hour basis.

Waterfield maintains a centralized Network Operations Center (NOC) staffed by geographically diverse employees trained to recognize illegal calling patterns and available after hours.

Waterfield monitors and analyzes its outbound traffic for suspicious patterns, to include illegal robocalls. Waterfield utilizes an internal software solution that evaluates its call detail records near real-time to detect changes in normal call patterns. The system alerts the appropriate parties for investigation via various communications channels, such as email and text. Waterfield's standard contractual terms permit it to suspend a customer's right to access or use Waterfield's services without notice if the customer's use of such services is not in compliance with their contractual obligations (e.g., if they are engaging in fraudulent activity, or are sending unsolicited messages). Waterfield may also terminate a customer's subscription to the service in its sole discretion.

See State Attorneys General Anti-Robocall Principles, November, 2019 (at: <https://www.tn.gov/content/dam/tn/attorneygeneral/documents/pr/2019/pr19-32-principles.pdf>)

Waterfield Investigates Suspicious Calling Patterns.

In instances that Waterfield identifies suspicious calling patterns, it adheres to procedures to investigate suspicious calling patterns.

Once Waterfield personnel become aware of suspicious calling patterns associated with traffic originating from its network, staff will examine the traffic in question.

The investigation will include a determination as to why the traffic has been flagged as suspicious, as well as the identity of the underlying subscriber.

Waterfield staff will consult with the customer to advise them on mitigation steps to cease or mitigate the calls in question.

Waterfield maintains the contractual right to terminate a customer in instances where they are not complying with acceptable use.

Waterfield takes the issue of unwanted and illegal robocalls seriously and is committed to ensuring that its network is not utilized for the origination of such calls.

Consistent with the FCC rules and regulations, Waterfield will respond fully and in a timely manner to all call traceback requests from the Commission, law enforcement, and the industry Traceback Consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Waterfield Has Designated an Employee Responsible for Addressing Robocall Mitigation-Related Issues.

The name, title, department, business address, telephone number, and email address of the person within Waterfield responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, is as follows:

Contact Name: [REDACTED]
Contact Title: Director - Platform Architecture
Contact Street: 1 WEST THIRD STREET, SUITE 1115
Contact City: Tulsa
Contact State and Zip Code: Oklahoma, 74103
Contact Telephone Number: [REDACTED]
Contact Email: [REDACTED]

Waterfield qualifies for an extension of STIR SHAKEN implementation under 47 C.F.R. CFR 64.6304(a) since we qualify as a small voice service provider with fewer than 100,000 voice subscriber lines