

Soleo Communications, Inc. (“Soleo”) Robocall Mitigation Plan

Service Summary

Soleo is a business to business value added service provider for phone calls. Our services include directory assistance automation along with custom interactive voice response treatments, and are performed between the originating service provider and terminating service provider networks. As such, the phone calls that we provide service to are initiated outside of our network by a number of external carriers. Some of those calls are serviced entirely on the carrier network, some are routed back to the originating carrier network for completion, and in other cases, after performing services, calls are connected to a destination through a call routed via a wholesale provider.

Subscribers Lines

As shown by our business description, Soleo is not a traditional Voice Service Provider with regard to having subscriber lines, and we do not provide retail phone service. We do not have any subscriber lines by a traditional definition.

STIR/SHAKEN Extension

Soleo is eligible for and is taking an extension for STIR/SHAKEN implementation, as we fall into the category of a small provider (fewer than 100,000 voice subscriber lines). While no call traffic originates on the Soleo network, all traffic that traverses it is subject to the robocall mitigation program details provided below.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). Calls serviced by Soleo originate from providers with whom we have an established contractual arrangement. Calls leaving our network are forwarded through a wholesale provider with which we also have an established contractual arrangement.

Follow Other Industry Best Practices

As a frequent attendee and former member of SIPNOC, Soleo closely follows the issues and recommendations for businesses operating in the call services industry. This includes, but is not limited to, proactively implementing new security and validation features as they are introduced into the SIP protocol.

International Call Prevention

The service infrastructure used by Soleo does not facilitate international calling.

Traceback Requests

Soleo is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, the Industry Traceback Group, or any of the carriers that we interconnect with. Soleo is committed to cooperating with such entities in investigating and stopping any robocall or otherwise illegal activity that may traverse our network.

Telephone Number Validation and Spoofing Prevention

The telephone number used as a caller identity for calls leaving the Soleo network must either be the number that was used in the originating call routed to the network, or in some cases be one of a list of numbers over which Soleo exerts direct control over. As a result, the services provided by Soleo do not facilitate the ability to illegally spoof a caller identity.

Investigation of Suspicious Calls and Calling Patterns

Soleo closely monitors the patterns of calls traversing our network. Calls of a suspicious nature are flagged, and patterns of suspicious activity are actively investigated. Suspicious call attributes and patterns include, but are not limited to:

- Caller identification numbers which are invalid based on NANP numbering rules, not allocated, not in service, or not a valid number for a call origination
- Caller identification numbers on a dynamic list of known bad originators
- Caller identification numbers used in a higher than expected number of calls
- Abnormal call volumes from a given call source
- Abnormal call volumes to a given destination
- Abnormal unanswered call rates
- Abnormal short call duration rates
- Abnormal long call duration rates
- Abnormal rate of change of any of the above rates

STIR/SHAKEN Implementation

While Soleo does not have access to a STIR/SHAKEN signing token, we are working with our inbound and outbound carrier partners to provide the best method for accurate attestation and verification of calls.