

INVOKA ROBOCALL MITIGATION PROGRAM

Invoca, Inc. (“Invoca”) is committed to combating spoofing and unwanted calls by complying with the STIR/SHAKEN guidelines. We provide call tracking services. We have several processes in place to prevent fraudulent activity as well as detailed procedures to react if a complaint is received. This document describes: (1) the specific reasonable steps Invoca has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program; (2) its commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls; and (3) Invoca’s process for updating its robocall mitigation program. Invoca is a small voice service provider, with 100,000 or fewer voice service subscriber lines. As such, Invoca is eligible for the STIR/SHAKEN implementation extension pursuant to 47 CFR § 64.6304. Invoca will use this extension, to the extent needed, to implement STIR/SHAKEN on its networks.

I. EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE ROBOCALL MITIGATION PROGRAM

Invoca has implemented meaningful protections to avoid originating illegal robocalls as part of its robocall mitigation program. [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[END CONFIDENTIAL]

At the outset of initiating Invoca’s services, customers must agree to Invoca’s Acceptable Use Policy (“AUP”) which is designed to combat robocalls before service is deployed.

Customers agree that they will not use Invoca’s software or platform to: (1) Generate robo-phone calls, robo-SMS, unsolicited or undesired phone calls or SMS; (2) Transmit exports (data-files or graphical reports) from Invoca’s platform to recipients not authorized to receive such exports; (3) Send SMS to recipients that have not provided their consent to receive SMS via some affirmative means, such as an opt-in procedures; or (4) Use LeadFlow, a lead generation service to offer virus protection or virus removal services in the form of pop-up advertisement and/or other similar virus-like techniques that lockup, otherwise impact or appear to impact functionality of a user’s computer or other devices, or similar tactics which have been deemed in violation of U.S. Federal Trade Commission regulations. In order to use Invoca’s services, customers must also expressly agree to comply with the following laws designed to combat robocalls and spam: (1) CAN-SPAM Act; (2) Canada’s Anti-Spam Laws (CASL); (3) E.U. – US Privacy Shield; (4) General Data Protection Regulation; and (5) Telephone Consumer Protection Act. Customers will not use Invoca’s services to engage in illegal, abusive, or similar behavior, such as: criminal or civil violations of state, federal, or international laws, regulations, or other government requirements, including fraud, forgery, theft or misappropriation of funds, credit cards, or personal information. Also prohibited is unauthorized access or usage of accounts and networks, service interference, use of the service to distribute software that covertly gathers information about a user or covertly transmits information about the user without authorization, and collecting information by deceit,

including, but not limited to Internet scamming (tricking other people into releasing their passwords), password robbery, phishing, security hole scanning, and port scanning.

Once services are initiated, Invoca engages in active fraud monitoring on its own network and [BEGIN CONFIDENTIAL], [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END

CONFIDENTIAL]

II. COMMITMENT TO RESPONDING TO TRACEBACK REQUESTS & INTERNAL EFFORTS TO EFFECTUATE TRACEBACKS TO COMBAT ROBOCALLS

Invoca is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

III. PLAN UPDATE PROCESS

Invoca ensures that its plan is up to date and will apply all required changes to be compliant with Commission requirements.