

Life With Doctors, LLC

Robocall Mitigation Policy

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Life With Doctors LLC.

II. General Prohibition Against Illegal Robocalling

Life With Doctors end-user services are subject to restrictions contained in its published legal notices, and all executed service orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibits activities normally associated with Robocalling, including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using Life With Doctors service to engage in or in connection with fraudulent activities

Life With Doctors end users are notified that Life With Doctors may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

Life With Doctors utilizes the mitigation technique of “Know Your Customer.” Life With Doctors is a long-established local provider that maintains a close relationship with its subscribers. Its customers are generally medical clinics serving local patients, and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling, allowing Life With Doctors to use targeted in-house analytics to monitor, alert, and apprehend suspected robocalling activities. Life With Doctors has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change. Life With

Doctors has screens for new customers requesting service at or above large volume calling capability levels:

- We disallow International calls
- We limited the simultaneous calls and maximum number of calls per destination
- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions

Life With Doctors periodically reviews traffic patterns with customers to prevent the Life With Doctors network from being used for illegal robocalling.

IV. Traceback and Enforcement Cooperation

Life With Doctors will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Life With Doctors will dedicate sufficient resources to provide prompt and complete responses to traceback requests.