

MedInformatix, Inc. (“MedInformatix”) is headquartered in Los Angeles, CA. MedInformatix leverages Bandwidth’s voice services to offer customers of its enterprise medical practice management platform voice capabilities. In this capacity, MedInformatix operates as a reseller of Bandwidth’s white-labeled services. MedInformatix does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, MedInformatix does not have the facilities necessary to implement STIR/SHAKEN. MedInformatix has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

MedInformatix follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of MedInformatix’s customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

MedInformatix’s services are targeted to small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using MedInformatix’s services agree to abide by the rules and regulations set forth in our “Internet Terms and Conditions” ([Terms and Conditions](#)). MedInformatix’s Internet Terms and Conditions expressly prohibit customers/subscribers from engaging in illegal activity, creating a false Caller ID (i.e., spoofing) or robocalling.

Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

III. TRACEBACK

MedInformatix commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal

robocallers use our system, MedInformatix will cooperate with such entities' investigation.

IV. ROBOCALL MITIGATION

MedInformatix has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

MedInformatix has the capability to mitigate robocalls using the mitigation methods listed below.

- Blacklists
 - Block calls by calling numbers or call prefixes
 - Block calls by SPIDs that are not customers of MedInformatix
 - Block calls originating outside MedInformatix's network or its customers' networks
 - Block IP addresses identified as SPAM or robocalls
 - Identify User agents that our customers do not use
- Call CAPTCHA
 - Call Detail Record (CDR) Analysis
 - Generate reports that identify high call volume, short call durations, and excessive calls to and from the same number
- Customer Controls
 - Call volume limits
 - Ability to block calls
 - Limit caller id to assigned telephone number

V. KNOW YOUR UPSTREAM PROVIDER

MedInformatix has agreements in place with all service providers that facilitate its provision of voice services. MedInformatix has confirmed that each of these service providers are listed in the Robocall Mitigation Database. MedInformatix will not accept traffic from any carrier that is removed from the Robocall Mitigation Database.

VI. CALL ANALYTICS SYSTEMS

Medinformatix leverages call analytics systems in place with its underlying provider, Bandwidth. Bandwidth developed and deployed a Call Blocking Tool that identifies and blocks "invalid, unallocated and otherwise obviously illegal telephone numbers."

VII. PLAN UPDATES

MedInformatix will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.

