

Robocall Mitigation Plan

STIR/SHAKEN IMPLEMENTATION

ELON.cloud, Ltd. is a small provider of voice telephony services and is not in control of the infrastructure necessary to implement STIR/SHAKEN. As we cannot technically implement STIR/SHAKEN directly, we submit this plan as documentation of our specific efforts to mitigate illegal robocalls within our services per the requirements of the FCC's "Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking , WC Docket No. 17-97"

ROBOCALL MITIGATION

ELON.cloud, Ltd. understands and is committed to implementing policies and procedures to ensure we are meeting our obligations towards eliminating illegal robocall activities in these three key areas - responding promptly to legal traceback requests, prevention of robocall origination from our platform, and mitigation of illegal calls should they occur.

TRACEBACK

ELON.cloud, Ltd. is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in providing any relevant, reasonable, and legitimate records request for call detail history to which we have access fully and within 24 hours of receiving any legal request.

PREVENTION

ELON.cloud, Ltd. requires all clients of our managed telephony services to provide detailed information about their organization and provide verified contact details in order to enter into an agreement for service. We have direct working relationships with all of our customers and are therefore aware of their requirements and intents for our services. By knowing our customer, we believe we can effectively monitor usage and flag unusual activity using our account monitoring tools. Additionally, as a provider exclusively of managed services, we maintain direct technical control of all equipment interconnected to our platform and can therefore prevent valid end users from utilizing any form of autodialing or mass calling technologies to affect illegal robocall activity and we control all mechanisms related to generating the CLID data associated with outbound calls.

MITIGATION

In the event that we should become aware that our platform has been utilized in any way to originate illegal calls, ELON.cloud, Ltd. shall immediately take all necessary technical and legal steps to discontinue service to the originator of the calling activity.