

PhoneSpeak

Robocall Mitigation Plan

1. Customer Vetting and Traffic Monitoring

PhoneSpeak has implemented robust policies and practices to prevent the origination of illegal robocalls, including:

- **Customer Vetting:** All customers are subject to a strict onboarding process. This includes verifying business identity, understanding the intended use of our services, and ensuring compliance with FCC rules and applicable laws.
- **Traffic Monitoring and Analytics:** All voice traffic originating from our network is continuously monitored using automated tools to detect unusual calling patterns, high call volumes, or other indicators of potential illegal robocall activity.

2. Outbound Calling and Call Authentication Practices

- PhoneSpeak exclusively uses **Bandwidth** for all outbound calling and phone number provisioning. By consolidating these services with Bandwidth, all calls originating from Bandwidth-provided phone numbers are signed with full STIR/SHAKEN “A” attestation, ensuring compliance and reducing the likelihood of call blocking by terminating carriers.
- **Call Authentication:** Calls are signed with appropriate certificates to validate the originating number. Any non-IP-based calls or calls that cannot be authenticated using STIR/SHAKEN are subject to alternative mitigation measures, such as real-time traffic analysis and additional scrutiny.

3. Mitigation of Calls Not Fully Authenticated

- Calls that cannot be fully authenticated are analyzed for patterns indicative of robocall activity. Calls flagged as suspicious are either blocked or subject to further review.
- Detailed reports are generated regularly, and flagged calls are reviewed by our compliance team to prevent potential abuse and mitigate risks.

4. Cooperation with Traceback Requests

PhoneSpeak fully complies with all traceback requests from the FCC, law enforcement, and the registered traceback consortium. We respond promptly to aid in identifying and stopping any illegal robocalling activities originating from our network.

5. Collaboration with Industry Initiatives

PhoneSpeak actively collaborates with Bandwidth and industry organizations like the Secure Telephone Identity Governance Authority (STI-GA) to support the adoption and implementation of robocall mitigation standards.

6. Consumer Education and Support

- PhoneSpeak provides educational materials to customers about the risks associated with illegal robocalls and the importance of compliance.
- Our support team is trained to address customer concerns, investigate reports of suspected robocalls, and assist clients in mitigating abuse of their accounts.

7. Regular Auditing and Reporting

- PhoneSpeak's robocall mitigation practices are reviewed quarterly to ensure they remain effective and comply with FCC requirements.
- Detailed logs of all flagged traffic and mitigation actions are maintained for at least two years and are available for inspection upon request by the FCC.

8. Certification and Commitment

PhoneSpeak certifies that it has implemented the practices outlined in this document and will comply with all applicable FCC rules and regulations under 47 CFR § 64.6305.

By leveraging Bandwidth's robust STIR/SHAKEN capabilities and implementing stringent internal monitoring and mitigation practices, PhoneSpeak ensures compliance with industry standards and actively works to prevent illegal robocalls.