



Robocall Mitigation Plan



Introduction

This document serves as Gradwell Communications Ltd ('Gradwell') commitment to proactively working across industries to identify, prevent and bring to justice, parties involved in illegal activities within telecommunications, particularly robocalling, whilst ensuring the legal and proper use for the remainder of our customers, remains unaffected.

Gradwell have voluntarily registered with the Robocall Mitigation Database (RMD) for a transparent collaborative approach with carriers and service providers and in support of regulatory best practice, in which we are confident will contribute to the effectiveness of the tool.

We operate as a VoIP communications provider both directly to end-users and via a partner framework. Our services are provisioned from upstream providers and routed through our network for connectivity.

We are actively working to support the STIR/SHAKEN framework requirements to identify and prevent illegal robocalling on our networks. This is under project investigation stage with an understanding that in conjunction with upstream carriers compliance measures, Gradwell will become fully compliant by June 2022.

Technical and Operational Mitigation

Prevention

Gradwell have an onboarding process in place with industry level 'Know Your Customer' checks which include verifying identity, registered business address and meeting geographical in-country restrictions before numbers are activated. Where relevant we are registered as an operator for routing calls overseas and work to remain compliant with changing regulations. We allow customers to use numbers they have purchased from Gradwell so we know they are entitled to use them. Where we are not the supplier of a CLI, we ask for a declaration from customers to confirm they are the number "owner" before we allow the CLI to be used. Contract terms are in place to ensure partners and end-users are aware of a zero-tolerance approach to illegal activities including robocalling, fraud and abuse. Regular newsletters remind and educate end-users on behaviour and activities that may constitute such illegal activities and consequences of failing to adhere.

Gradwell work to comply with all applicable laws against illegal activities and will cooperate fully with investigations by Government bodies.

Detection

We monitor and restrict the CPS rate for all end customers, this prevents saturation and very high volumes of calls.



When unlawful activity is detected on our network, Gradwell will take immediate action to stop this occurring and suspend the originating outbound line until investigations have been completed.

Our own network applies call set-up restrictions on anyone who consistently tries to deliver large volumes of calls simultaneously over a short period of time (typical behaviour for robocallers). A 'calls per second' cap is also in place to help prevent autodialler traffic. Outbound and Inbound VoIP calls are routed via upstream providers who have implemented their own monitoring and detection technical functionality.

Mitigation

We have dedicated in-house technical security teams to design and maintain our network architecture with lawful secure services as a priority and a Governance team to monitor and maintain compliance with regulatory requirements. We work closely with upstream providers to eradicate unlawful behaviour.

Once alerted to suspected fraudulent behaviour, a block is applied to the number/s in query whilst further investigations are carried out.

Gradwell cooperate fully with global Law Enforcement Agencies (LEA's) and if, following an investigation, unlawful activity is confirmed, this may result in a termination of end-user services and will be reported to the necessary authorities.

Our experts subscribe to and take an active role in telecommunications industry groups to maintain awareness of upcoming regulatory changes, local interpretation and implementation of compliance and security along with best practice methodology.