

Robocall Mitigation Plan

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All customers using Norman Frederick, LLC (NFLLC) as a VoIP service provider are subject to the following rules regarding phone calls originating on the Trunks and DID's that are used on any system or device.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC367133A1.pdf>)

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

NFLLS provides the following solutions to prevent the origination of illegal robocalls:

- No Outbound calls can show an outbound caller ID that differs from a phone number owned by the Customer.
- No excessive Dialing or short Dialing (less than 6 second) is allowed.
- Any traceback requests from the FCC, law enforcement, or the industry traceback consortium will have full cooperation from NFLLC to stop or investigate illegal robocallers.
- Call Blocking Support: Accurate identification enabling subscribers to block fraudulent phone calls as per the TRACED Act (2019)
- Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with an override to include original caller ID even when a call is determined fraudulent.

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In addition, we have implemented a Call Abuse Policy, terms of use, and have notified our customers of the policy as shown below:

“Any call originated on the NFLLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the NFLLC network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”