

Robocall Mitigation Policy

Robocall Mitigation Compliance

Date	On behalf of	Change Summary
April 19, 2024	One Hour Onsite, LLC. d/b/a/ OHO Connect	V1.3

Objective: Establish and follow a policy that is compliant with [47 CFR § 64.6305](#)

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Voice Service Providers must implement a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of One Hour Onsite, LLC, a Voice Service Provider. OHO Connect services commercial customers in its home state of Ohio and nationally, and will be referred to as OHO throughout this document.

I. STIR / SHAKEN

Bandwidth.com is OHO's upstream VoIP provider. Through this partnership, OHO relies on Bandwidth.com's procedures, policies and mitigation techniques to ensure our customers are adequately protected from Robocalls and Spoofing. OHO has fully implemented STIR / SHAKEN to ensure all calls are fully compliant with 64.6301(a)(1) and 64.6301(a)(2) of the FCC rules.

II. Know Your Customer

OHO utilizes the mitigation technique of "Know Your Customer." OHO maintains a close relationship with its subscribers. Its customers are generally "mom and pop" users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling, which allows us to use targeted in-house analytics to monitor, alert and identify suspicious calling behavior.

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OHO has monitors calling discrete calling levels based on customer size. The level – referred to as “large volume calling capability” – is subject to change. Customer usage patterns are measured and high-water mark thresholds are enforced.

OHO has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- An OHO representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

III. Enforcement

All OHO voice traffic is subject to the processes set forth in this mitigation plan.

OHO end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the OHO service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

OHO’s end users are notified that OHO may take action up to suspension or termination of service for violation of the TOS.

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OHO is continuing to develop in-house monitoring strategies that allow for real-time traffic analysis and will flag call patterns indicative of potential illegal robocalling. Additional capabilities are being added to automatically disable any subscribers associated with flagged call patterns.

IV. Traceback and Enforcement Cooperation

OHO will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. OHO will dedicate sufficient resources to provide prompt and complete responses within 24 hours of all traceback requests.