



Robocall Mitigation Plan for NEVER BUSY LLC

Never Busy LLC (“Never Busy”) is a Unified Digital Workspace Company that offers interconnected VoIP services to its subscribers on a resold basis. Never Busy’s wholesale VoIP provider is **Bandwidth, Inc.** (“Bandwidth”), a provider of wholesale and retail VoIP and other communications services across the United States. While Never Busy necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by Bandwidth, Never Busy has also implemented its own robocall mitigation plan to limit the potential for the origination of unlawful robocalls by its customers. Never Busy utilizes a call analytics platform from **TransNexus Inc.** (“TransNexus”) to assist with the detection of illegal robocalls on its network based on TransNexus’s scoring and analytics.

Know-Your-Customer Policies

Subscriber Vetting: Never Busy vets the identity of its customers when approving an application and entering into a contract for telephone service. As part of this vetting process, Never Busy collects the customer’s legal name and address, physical location, and contact information, and, for commercial customers, federal tax ID. Never Busy may require additional information to validate the customer. In some instances, Never Busy also utilizes third-party agencies for additional information regarding the credit and/or fraud risk associated with a potential customer. Never Busy’s services are provided to fixed locations using its own network, and services are typically installed on location by its personnel, so Never Busy knows the actual location of its customers. All of this information enables Never Busy to validate the identity of potential customers prior to provisioning service. Never Busy will not provide service if a new customer’s identification cannot be verified.

Contractual Terms: Never Busy’s VoIP Subscription Agreement prohibits the use of Never Busy’s service for any unlawful or fraudulent purpose. The terms provide that Never Busy may disconnect the service if Never Busy determines, in its sole judgment, that a customer’s use of the service violates the Subscription Agreement.

Use of Call Analytics to Identify and Block Unlawful Traffic

Never Busy relies on TransNexus’s ClearIP dynamic call analytics systems to identify and block unlawful robocall traffic. The call analytics employed by TransNexus for Never Busy’s traffic can detect call patterns that indicate robocall activity, including, but not necessarily limited to, calls from numbers that are invalid, unallocated, or on the Industry Traceback Group’s Do Not Originate (“DNO”) list.

If Never Busy receives a report or alert from Bandwidth and/or TransNexus of suspected unlawful robocall traffic originated by a Never Busy end-user customer, Never Busy will conduct an investigation. To the extent a customer is found to have violated Never Busy’s Subscriber Agreement, Never Busy will take action commensurate with the severity of the customer’s offense, including, but not limited to, providing the customer with a warning or terminating the customer’s service without notice.



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Knowledge of Upstream Providers

Never Busy's upstream provider, Bandwidth, is a well-known, reputable wholesale service provider that is registered in the FCC's Robocall Mitigation Database. Never Busy does not itself have knowledge or insight into the upstream providers from which Bandwidth receives traffic but understands from Bandwidth's mitigation plan that Bandwidth's direct upstream connections are with service providers that similarly have represented to the FCC that they have policies and procedures to identify and block unlawful robocall traffic.

Cooperation with the Traceback Group, Law Enforcement, and Government Agencies

Never Busy is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group ("ITG"), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by Never Busy customers. Never Busy is also committed to cooperating with Bandwidth on traceback requests and to fully complying with the Commission's robocall blocking requirements. Never Busy understands that Bandwidth will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on the DNO list issued by ITG.