

Nikoo Robocall Mitigation Plan:

Nikoo ("NIK") is an interconnected VoIP provider focusing on major operators International Gateway traffic collection. Pursuant to 47 C.F.R. § 64.6305, NIK submits its Robocall Mitigation Program ("RMP") concerning its implementation of the STIR/SHAKEN authentication framework in its Internet Protocol ("IP") network along with NIK's practices and procedures to prevent and mitigate illegal robocalls. NIK is dedicated to stopping illegal calls from Originating and or traversing through its network in accordance with Federal Communications Commission (FCC) regulations leveraging its "Best Practices" guidance.

NIK is classified as a small provider, and it is subject to the commission's two-year extension. Irrespective of that, "NIK" is working diligently to implement STIR/ SHAKEN call authentication protocol in our IP network. We are also committed to respond to all traceback requests from the Federal CommunicationCommission, Law enforcement, and the industry traceback consortium. NIK will cooperate with such entities in investigating and stopping any illegal robocaller from using our services to originate or terminate calls.

This document details NIK's Robocall Mitigation Plan.

1. All NIK customers must sign and agree to comply with FCC, FTC, TCPA, and all applicable State and Federal laws prohibiting illegal robocalling. Furthermore, they must agree for NIK to block or terminate their services if they breach such provisions.
2. Know Your Customer (KYC) is another key element in the eradication of Robocalling. NIK's products and services are geared toward Wholesale, Enterprise, and Call Center customers. Our new onboarding process undertakes various commercially reasonable processes to verify all our prospects before getting into formal agreement. We collect all pertinent information such as physical business address, primary contact person, state or county of incorporation, Federal Tax ID (if applicable), USAC ID, banking or payment information, and the nature of their business.
3. NIK continuously monitors calling patterns in and out of our network to identify fraudulent traffic, including robocalling, traffic pumping and International Toll fraud. NIK will block services to a customer if it determines that the customer is using the services for any illegal activities or robocalling. The offending customer's agreement will be terminated immediately if the violation is determined to be intentional.
4. NIK will only accept traffics for termination from carriers and operators that are in the Robocall Mitigation Database effective September 28th, 2021.
5. NIK commits to continuously search for the best industry practices to improve and strengthen our Robocall Mitigation plan as new ideas evolve. NIK will continuously improve our internal process to ensure this plan and our systems adapt to this ever-changing problem.