

Robocall Mitigation Policy

Overview

This mitigation plan is submitted on behalf Voipleague.

Voipleague resells inbound/outbound line service.

STIR/SHAKEN Extension – Small Voice Service Provider

Voipleague is subject to the STIR/SHAKEN implementation extension for non-facilities-based small voice service providers under 47 CFR § 64.6304 because it is not a facilities-based provider and has fewer than 100,000 voice subscriber lines. Accordingly, Voipleague is subject to the shortened STIR/SHAKEN implementation deadline of June 30, 2022.

Voipleague has implemented the following Robocall Mitigation Plan:

- Procedures in place to confirm the identity of new commercial VoIP customers by collecting information such as business location, contact person(s), state and country of incorporation, Federal Tax ID, general nature of the customers business, names of all of the officers, directors of business, public research into the history of the company, including public complaint data on other business reputation data, officers/directors and any other business in which they may be involved All customers are known to Voipleague and have valid, established businesses.
- On average, customers are allowed 1.5 lines per individual user. Customers requesting total lines above this standard require special approval.
- Call thresholds are monitored during regular business hours and system logs are reviewed daily.
- Each new customer must sign a Service Contract. The customer must sign a Service Contract or it will not be permitted to use the service.
- Requiring customers to participate in any US Telecom or ITG traceback request.
- Contractual terms with subscribers specify voipleague may take action, up to suspension or termination of service, for violation
- We will maintain participation in the FCC Robocall Mitigation Database (RMD) and will adhere to its guidelines and best practices

Voipleague existing contracts explicitly prohibit illegal robocalling and state that services will be terminated if a customer engages in illegal robocalling.

Voipleague existing contracts also prohibit activities associated with illegal 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 Voipleague service to engage in or in connection with fraudulent activities.
- Notifying Voipleague customers that Voipleague will take action for violation of the contract, including suspension or termination of service.

Ongoing Monitoring

- Voipleague has access to customer settings that are frequently monitored to ensure Caller ID requirements are being followed. If a customer is using Caller ID that does not belong to them, Voipleague will notify the customer of the violation of terms of the contract and will take immediate action.

PLAN UPDATES

- This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Voipleague will monitor industry best practices and continuously improve our internal processes to ensure this plan and our systems to adapt to ever-changing issues. In the event of any material changes to this plan, Voipleague will republish this plan to its employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database

International Customers

All robocalling restrictions and monitoring procedures apply to international businesses.

Traceback and Enforcement Cooperation

Voipleague will actively, fully, and timely cooperate with traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Voipleague will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

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