

ROBOCALL MITIGATION PLAN DESCRIPTION

Customer Onboarding and Verification

KYC (Know Your Customer) Process: All new customers undergo a stringent KYC verification, requiring valid business information and identification. Only reputable, law-abiding clients receive access to our platform.

Call Traffic Monitoring and Detection

1. We have strict firewalls in place to only allow traffic from specific IPs to access our PBX system.
2. We continuously monitor call volumes, call destinations, and calling patterns. Unusual spikes or repetitive call behavior trigger immediate investigation.
3. All calls are logged in to the PBX for traceback option and can be provided as needed.
4. We allow only verified CLI/ANI in our network. Our Network team verify each CLI/ANI manually and then whitelist in our network.
5. We notify fraudulent customers to stop illegal traffic as soon as we come to know about such incident(s).
6. We maintain Database of invalid numbers and keep it updating dynamically. If any call matches with an invalid number in database, it terminates there and is not sent to upstream provider(s).

Collaboration with Upstream Providers

1. Reputable Partners: We work with well-established VoIP and SMS providers—such as Tata Communications, Voxbone — that maintain their own strict compliance frameworks.
2. Shared Intelligence: We communicate regularly with our upstream partners, sharing information and responding swiftly to any indicators of suspicious or noncompliant behavior.

Enforcement Actions and Remedies

1. Investigation Process: Upon receiving complaints or detecting suspicious traffic, we conduct thorough investigations into affected accounts.
2. Mitigation Measures: If we confirm noncompliance, we immediately restrict or terminate the offending account and, when necessary, report the matter to the appropriate authorities.

Reporting and Record-Keeping

1. Documentation: We maintain comprehensive records of customer onboarding, monitoring activities, investigations, and enforcement actions for a period of at least three years. Call Detail Records (CDRs) are maintained for a period of 5 years.
2. Regulatory Reporting: We comply with all FCC reporting requirements and remain prepared to provide relevant information to regulatory bodies upon request.

3. Traceback Responses – We adhere to traceback guidelines to report traceback cases within 24 hours.

(b): We analyze Call Detail Records to find out unusual/robocall calling patterns, then notify and suspend such customer(s).

(c): We execute trial run and then sign formal agreement with our upstream provider(s) before on-boarding them.

Contact Information for Robocall Mitigation Program:

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(a): Call is originated by our end customers from their network, we as a service provider handover call to our upstream provider(s).

(b): We have never requested STIR/SHAKEN implementation extension or exemption in the past. We are engaged with providers like Trasnexus, Ribbon to implement STIR/SHAKEN in our network. And we will complete this no later than 31st Mar 2025.

(c): WPI Group Inc. or any of its affiliated entities has NOT been subject to a Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD certification.

(d): We are fully committed to responding to traceback requests.

We have received 7 traceback requests for the year 2024 as of date and all were responded to within 24 hours.