



NMSurf, Inc.
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Robocall Mitigation Plan

Updated: March of 2024

1. Introduction

This Robocall Mitigation Plan (RMP) is being provided pursuant to the TRACED Act and the rules adopted by the Commission requiring voice service providers to implement STIR/SHAKEN caller ID authentication technology in the Internet Protocol portions of their networks.

NMSurf Inc. is primarily a Broadband provider and is also a very small interconnected VOIP provider. In accordance with the requirements of 47 CFR 64.6301, NMSurf is exempt until June 30th, 2023 per 47 CFR 64.6304 from the implementation deadline.

Our underlying provider is Thinq Technologies who currently is implementing STIR/SHAKEN and will sign all unsigned calls originating from their network. NMSurf, Inc. receives all its ANIs from Thinq and does not pass any other ANIs to Thinq, so all ANIs are originated from Thinq and they are signed with attestation level A. Because NMSurf, Inc. will not pass unknown ANIs to Thinq, there is no need for further attestation.

2. We Know Our Customers

NMSurf, Inc., currently has an agreement on file for each one of its customers which includes Name, Address, Email, Contact Telephone Number, and signature. All ATAs are configured by our customer service team and authenticated by our system prior to allowing outgoing or incoming calls. Our system requires all ATAs to authenticate prior to allowing outgoing or incoming calls.

3. Telephone Number Validation:

NMSurf, Inc. provides the customer with a number that it acquires through its vendor Thing. If a customer ports a number, Thing will bring that number under its database and attest to the number at a level A for that number.

4. Monitoring

Monitoring of the network is done at our originating providers network. They utilize monitors, metrics, and ratios of failure types, quantity, calls per second, and ANIs originating from multiple sources and complete rates to detect behavior consistent with robocalling.

5. Traceback and Activity Support

NMSurf, Inc. can view detailed logs and also has vendor support to investigate further to assist with tracebacks.

6. Blocking

NMSurf, Inc. relies on its vendors to block offensive ANIs; however, if a specific customer requests a block, we have the capability to block the number.

7. Acceptable Use Policy

NMSurf, Inc. AUP requires the responsible use of our networks, systems, services, websites by our customers which allows us to provide our customers with secure, reliable and productive services. Our AUP along with our transparency and privacy policy can be viewed at nmsurf.com/accountmanagement