

RoboCall Mitigation Plan

This robocall mitigation plan is for VoIPCo Inc (DBA "NoContractVoIP"), with headquarters at 818 N. Mountain Ave, Suite 205, Upland, CA 91786.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

VoIPCo Inc has not been prohibited from filing a certification in the Robocall Mitigation Database. VoIPCo Inc does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

VoIPCo Inc uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer (KYC) Procedures We utilize stringent, prescriptive protocols for vetting caller identity and operational legitimacy for new and existing customers prior to the activation of any service.

This process includes:

- **Mandatory Data Collection:** Before granting network access, we collect and independently verify the customer's legal name, primary physical address, a valid government-issued identification number (such as an Employer Identification Number), and an alternate verified telephone number.
- **Data Retention:** We retain all customer identification and verification records for a minimum of four years after the termination of the customer relationship.
- **Continuous Monitoring and Red Flags:** We actively monitor our customer base and re-verify identity information when suspicious "red flags" are triggered. These red flags include, but are not limited to, the use of registered agents or virtual offices as physical addresses, the use of residential addresses for corporate accounts, a lack of commercial web presence, and attempts to use non-traceable payment methods.
- **Enforcement Checks:** We use verified information to determine whether the customer is subject to any enforcement actions that restrict the type of calling they may do (e.g., bans from initiating telemarketing calls).
- **Number Validation:** We validate that the entity has a legitimate right to use its asserted calling numbers to support the attestation level we assign to their originated calls.

Our contractual provisions with customers explicitly prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, we immediately terminate their service.

Know Your Upstream Provider Providers:

- VoIP Innovations, a Sangoma Company
- Website: <https://carrierservices.sangoma.com/>
- Address: One Penn Center West Drive, Suite 400/406, Pittsburgh, PA 15276, USA
- Phone: +1-877-478-6471

We have a strict vetting and review process for upstream providers that send us voice traffic. We confirm that all upstream providers have an active certification in the Robocall Mitigation Database and we will not accept voice traffic from an unregistered provider. We establish an understanding of the upstream provider's role in the call path to understand whether we are obligated to authenticate unsigned traffic received from them.

We require that upstream providers:

- Maintain a reasonable robocall mitigation plan, including vetting processes for their own customers and upstream peers.
- Use call analytics to identify suspicious traffic.

Traceback Commitment We commit to responding within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program & Call Analytics We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list. We perform the same mitigation steps for all outbound calls regardless of our role in the call chain. We investigate any identified suspicious calls immediately.

10-Business-Day Material Change Update Commitment VoIPCo Inc. explicitly commits to updating its filing in the Robocall Mitigation Database, as well as its associated Commission Registration System (CORES) information, within exactly 10 business days of any material change to our business operations, contact information, ownership, or STIR/SHAKEN implementation status.

STIR/SHAKEN We have registered with the STI-PA using OCN 337K. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

Key Company Officer Information Chris Loomis

- Title: CEO
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