

Robocall Mitigation Plan

NETEO is a small voice service provider (VSP) dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. The FCC requires that, by June 30, 2021, all VSPs certify in the Robocall Mitigation Database that they have (1) fully implemented STIR/SHAKEN across its entire network, (2) implemented STIR/SHAKEN on a portion of its network and that the remainder of the calls are subject to a Robocall Mitigation Plan (RMP), or (3) have not implemented STIR/SHAKEN but subject all calls to an RMP to ensure that the network is not originating illegal robocalls.

The FCC requires that VSPs develop an RMP that:

- Lists the specific, reasonable steps the VSP has taken to avoid originating illegal robocall traffic
- States a commitment to respond fully and in a timely manner to all traceback requests from the FCC, law enforcement, and the industry traceback consortium
- To cooperate with entities investigating and stopping any illegal robocallers that use its services to originate calls

NETEO purchases origination, termination, and hosted-switch access from Atheral LLC (FRN 0028070290) who provides crucial elements of our RMP as part of their interconnected white-label VoIP wholesale services to NETEO.

STIR/SHAKEN Extension

We are eligible for and are taking STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 because we have fewer than 100,000 voice subscriber lines. All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>). As an ISP we provide high speed internet to customer end location which requires physical access to their location and provides us multiple contact points and not just phone service.

International Subscribers

NETEO does not sell origination or termination services to subscribers outside of the United States.

Acceptable Use Policy

NETEO maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use NETEO's broadband or voice services. Among other things, this AUP prohibits use of the service to:

- transmit, receive, store, post, or otherwise disseminate any defamatory, obscene, libelous, unlawful, or threatening data, information, or material.
- engage in unsolicited bulk or commercial messages ("spam").
- impersonate any person or entity by name or other identifier in messages, engage in sender address falsification, forge anyone else's digital or manual signature, or perform any other similar fraudulent activity, commonly referred to as "phishing".
- perform any service, alterations, or modifications with the NETEO equipment or Service or permit any other person to do such who is not authorized by NETEO.
- use of encryption technologies to mask the presence of servers or server software.

Traceback Requests

NETEO is committed to respond in a complete and timely manner to all traceback requests from the Federal Communications Commission, law enforcement, state attorneys general, Atheral LLC, and the industry traceback consortium. Furthermore, NETEO is committed to cooperating with such entities in investigating and stopping any illegal robocallers that use NETEO service to originate calls. Subscribers are required to comply with traceback requests via our AUP. Traceback requests can be sent to support@neteo.co for immediate processing by NETEO.

Telephone Number Validation

If a subscriber wishes to use a telephone number (TN) as a caller identity and that TN is not directly managed by NETEO or our wholesale partner Atheral LLC, then TN validation is necessary by requiring the subscriber to provide a valid letter of authorization that they are an authorized user of such TN. Should the subscriber provide sufficient documentation to NETEO of authorization to use a TN, documentation will be provided to Atheral LLC so that they can attest calls originated with these TNs.

Investigation of High-Volume Network Traffic, Suspicious Calls, and Calling Patterns

Our wholesale VoIP provider, Atheral LLC uses TransNexus's ClearIP solution to monitor our origination voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts Atheral LLC if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. Atheral will immediately ask NETEO to investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If NETEO or Atheral LLC determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as based on our AUP.

Examples of calling patterns monitored

- Higher than expected cost generated by calls from a subscriber
- Targeted pumping of repeated calls to a specific called number within a 15-minute period
- Fast traffic pumping of repeated calls to a specific called geographic location within a 5-minute period
- Slow traffic pumping of repeated calls to a specific called geographic location within a 60-minute period
- Theft of service traffic pumping of repeated calls to high-cost geographic location within a 60-minute period
- Recent call volumes (last 60 min) vs weekly trends
- Number of unique destination numbers in a 60-minute time frame
- Irregularities in Short Call Duration (SDC) and Average Call Duration (ACD) distribution
- Anomalies in Answer-Seizure Ratio (ASR)
- Robocalling triggers monitoring for a high-volume of outbound calls or excessive incoming calls from the same calling number
- Wangiri trigger monitoring for origination calls to high termination rate destinations with short duration (to trigger end-users to call back) for all calls over a 5-minute duration
- Analysis of recent and past Call Detail Records (CDRs) to benchmark against expected trends

STIR/SHAKEN Implementation Timeline

Atheral LLC has committed to NETEO that on or before December 31st, 2021 that they expect to be authenticating and verifying with STIR/SHAKEN voice traffic that originates and terminates on our network. NETEO has every confidence Atheral LLC will meet the June 30th, 2023, deadline provided by the exemption granted.