



Blu Space Inc Robocall Mitigation Plan

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>)

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

We are a reseller of voice services hosted on VoIP platforms by AT&T, Ooma Enterprise and Ring Central and do not have the capability to implement STIR/SHAKEN. Our VOIP suppliers have implemented STIR/SHAKEN protocols in their networks.

Robocall Mitigation Program

We monitor our outbound voice traffic and look for anomalies in traffic to prevent the origination of illegal robocalls. Our customers use their voice networks for valid business purposes and are vetted for possible marketing schemes.

Combining behavioral analytics, caller authentication and verification, our solution features:

- Fraud Detection: Detection of high volume robocalling, spoofing and spam call activity.
- Subscriber Notification: Caller ID Name override to warn subscribers of suspicious calls.
- Call Blocking Support: Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.

In addition, we have implemented a Call Abuse Policy and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

"Any call originated on the network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court."