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Robocall Mitigation Plan for I P Keep, Inc. (DBA Chattanooga Software Center)

This Robocall Mitigation Plan is submitted by I P Keep, Inc. pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls

The following policies apply to all customers and/or prospective customers of I P Keep, Inc. and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic from our network:

- 1. CUSTOMER DISCLOSURES AND CONFIRMATION:** All customers are required to disclose certain information about their business such as physical location, contact personnel, state/country of incorporation or business formation, federal tax I.D. or non-USA government I.D. They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic which originates from each customer’s switch including the type of customers they acquire and exact type of services they provide. I P Keep investigates each Customer’s claims to verify accuracy before accepting them as a customer.
- 2. MONITORING AND TRACEBACK:** I P Keep monitors its system diligently and will investigate any suspicious traffic. We act promptly when we detect traffic which appears to be robocall activity to ensure it has been pre-authorized as “legal” (i.e. authorized political, non-profit, reverse 911 or fully-opted-in traffic). In the event I P Keep receives a Traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s) and insist on immediate corrective action. We timely respond to all Traceback request from authorities. If corrective action is not timely provided by our customer, I P Keep takes whatever action is necessary to prevent recurrence of the event(s).
- 3 KNOW YOUR UPSTREAM PROVIDER PROCEDURES** As a small provider of internet phone services, the number of upstream providers used by the Provider to receive and deliver its originated voice calls for termination are somewhat limited. The Provider has longstanding relationships with these upstream providers and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. Further, the Provider, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their

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networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any contracts that the Provider may directly have with any upstream provider entities. Included as part of Appendix A to this Robocall Mitigation Plan document is a list of the Provider’s current, immediate “Upstream Provider(s)” along with contact information for each.

4. FOREIGN SOURCES OF TRAFFIC: I P Keep has non-USA customers which service their own customers and traffic that originates from both USA and Non-USA sources. We take extra precautions relative to Non-USA customers to ensure they meet all requirements of this Robocall Mitigation Plan. Prior to authorizing a foreign customer for calling privileges, we verify all information requested.

5. ROBOCALL MITIGATION DATABASE: I P Keep, Inc. requires all its wholesale customers to be registered with the Robocall Mitigation Database. Those wholesale customers not registered with this database will not be allowed access to our network.

6. CALL BLOCKING: I P Keep software does not directly receive any incoming calls. I P Keep there for relies on our clients destination phone services assigned by our client for receiving incoming calls and our upstream provider(s) to block calls originating from numbers known to to send illegal robocall traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation. I P Keep does block all originating phone numbers requested by our client, or our upstream provider(s).

7. LAW ENFORCEMENT COOPERATION: I P Keep cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.

Appendix A

Traceback Request Single Point of Contact:

Name: Susan Steffey

Title: President

Phone Number: 423-821-3463

Email Address: fcc@surfnusa.net

Upstream Provider Information:

Name of Upstream Provider: Bandwidth, Inc.

Nature of Business: Tandem Switch Provider; Wholesale Internet Phone Provider

Network Location of Upstream Provider: Raleigh, NC

Phone Number: 1 (855) 864-7776

Email Address: operations@bandwidth.com

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