

Robocall Mitigation Plan

Business Information

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Contact Information

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Purpose

Salesforce Communications, LLC ("Salesforce") is a VSP offering voice services, initially as contact center as a service, to its customers primarily for customer support uses. Salesforce is dedicated to preventing and stopping illegal calls from traversing the network through various mitigation strategies that include "know your customer" ("KYC") and "know your upstream provider" procedures, contractual protections, and technical controls used to identify and block illegal call traffic over the network. Salesforce has fully implemented STIR/SHAKEN. In compliance with the R&O, Salesforce submits this RMP and STIR/SHAKEN certification. Salesforce implements FCC, GSMA & CTIA mandates and industry practices in order to prevent and block all illegal calling over its network.

Technical and Operational Protections

Salesforce has implemented technical and operational protections to prevent illegal calls through our services. Salesforce has fully implemented STIR/SHAKEN for all calls transmitted over IP. Calls are signed accordingly in order to ensure that all traffic transmitted, originated, and/or terminated on behalf of our customer is associated with the entity that has a business relationship with Salesforce.

As described in more detail below, Salesforce has processes in place to rapidly assist the ITG with any traceback requests to identify the sources of any illegal calling and to prevent future unwanted illegal call traffic. Salesforce is committed to working closely with law enforcement and with its interconnected carrier partners. Salesforce security and fraud teams are poised to respond to complaints associated with unlawful use of Salesforce services.

Prior to having access to the Salesforce services, Salesforce collects information about its customers, including but not limited to, business contact information, websites, phone numbers, and points of contact with the customer.

Analytics of Call Traffic and Blocking Capabilities

Salesforce works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network. Salesforce will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and actions taken in response thereto.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Salesforce's risk prevention team is alerted, which follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- Checking recent and past call detail records(CDRs) and benchmarking against expected trends;
- Checking recent and past account activity;
- Investigating if any system issue generated the unusual behavior;
- Contacting the subscriber to understand his or her particular use case and validate the activity belongs to that subscriber.

Salesforce follows Industry Traceback Group ("ITG") recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Salesforce will devote sufficient resources to provide prompt and complete resources to traceback requests. Salesforce will respond to all traceback requests within 24 hours of being notified of the same.

Know Your Upstream Providers

Salesforce has an agreement in place with our sole upstream provider, Bandwidth, Inc. ("Bandwidth"), requiring Bandwidth to maintain and comply with all laws and regulations, including maintaining valid registrations in the FCC's Robocall Mitigation database.

Bandwidth, Inc.
2230 Bandmate Way
Raleigh, NC 27607
(919) 439-3571
legal@bandwidth.com

Bandwidth is contractually to Salesforce to abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Salesforce. Salesforce and Bandwidth have agreed to work together diligently to mitigate all illegal robocalls, including collaborating fully when receiving ITG traceback requests.

Contractual Protections & Acceptable Use Policy ("AUP")

Prior to being permitted to use the Salesforce services, Salesforce customers must agree to service agreements, an AUP, and additional binding documentation that prohibits:

- Violating applicable law or regulations in their use of the services;
- Violating applicable industry standards, third-party policies, or requirements that Salesforce communicates to its users or other generally accepted industry associations, carrier guidelines, or other industry standards;
- Generating or facilitating calls that violate any applicable law including anti-spam, telemarketing, robocalling, caller ID spoofing, or telephone consumer protections laws or regulations; and
- Using Salesforce services to engage in or in connection with any fraudulent activities.

Salesforce's contractual terms specify that Salesforce may take action up to suspension or termination of service for violation of the service agreement, AUP, or other binding documentation.