

# VOWtel, LLC

## Robocall Mitigation Plan

The following outlines and details the steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program:

- 1) VOWtel resells voice services from Whitelabel Communications and therefore does not own any VoIP Switching Facilities. As a reseller, VOWtel LLC has no control over the VoIP Switching Facilities.
- 2) Cooperation in Contracts: VOWtel has made sure its contract is clear about the kind of traffic it will (and will not) accept from its customers. VOWtel has notified them that if they do not follow the rules, they will be subject to prompt termination. If they are found sending calls that VOWtel believe are illegal, they will forfeit confidentiality and their information will be shared with enforcers and industry partners.
- 3) VOWtel has made significant endeavors to know its customers and confirms the identity of new commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of customer's business. VOWtel makes sure any suspicions are allayed before turning on service and does not give anonymous test accounts to auto-dialers.
- 4) VOWtel takes quick action and follows a plan that allows it to act promptly and decisively on anything suspicious detected by its monitoring. If VOWtel gets a traceback notice for an illegal robocall, it does not leave the issues unresolved but rather, VOWtel insists on specific, deterministic explanations with explicit corrective actions from its customers.
- 5) VOWtel performs Call Blocking destined to specified phone numbers as appropriate for robocall mitigation.
- 6) VOWtel cooperates with investigative bodies and stands ready to comply with traceback requests by law enforcement, the FCC, or the Industry Traceback Group, the official consortium designated to lead private traceback efforts.