



Robocall Mitigation Plan and Certification

Know Your Customer (“KYC”)

The precise identification of a subscriber within the STIR/SHAKEN ecosystem is linked to a caller identity based on a telephone number associated with a paid subscriber. A subscriber refers to an entity that maintains a business relationship with Blu Oak Group, Inc, whereby Blu Oak Group, Inc. facilitates the transmission, origination, and/or termination of calls on behalf of the subscriber.

Blu Oak Group's Know Your Customer (KYC) program entails the acquisition and documentation of particular information from subscribers upon the initiation of service. This process encompasses the gathering of data including:

- physical business location(s);
- contact person(s);
- nature of customer’s business

Know Your Upstream Providers

In accordance with the Commission’s requirement in Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Blu Oak Group, Inc. provides the following information concerning its upstream voice carriers.

Blu Oak Group, Inc. receives voice traffic from the following upstream provider:

Bandwidth Inc.
900 Main Campus Drive, Suite 100
Raleigh NC 27606

According to the Robocall Mitigation Database, Bandwidth is fully STIR/SHAKEN compliant and, to the best of Blu Oak Group’s knowledge, information, and belief Bandwidth has been, and will continue to sign calls transmitted to Blu Oak Group, Inc. and will comply with the Commission’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Blu Oak Group, Inc.



Acceptable Use Policy (“AUP”)

Blu Oak Group maintains an AUP that subscribers must sign before being permitted to use Blu Oak Group’s VoIP service. The Blu Oak Group AUP prohibits:

- Providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call
- Violating any applicable local, state, or federal law
- Violating applicable industry accepted guidelines
- Using Blu Oak Group’s service to engage in or in connection with fraudulent activities.

Blu Oak Group’s contractual terms with subscribers specify that Blu Oak Group may act by immediately terminating service for violation of the AUP.

Telephone Number Authorization

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify an outbound caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity that is directly managed by Blu Oak Group and/or obtained by Blu Oak Group from one of Blu Oak Group’s underlying carriers for use by the subscriber.

In ALL cases, Blu Oak Group directly manages the TNs used by its subscribers. Blu Oak Group tracks these numbers in its inventory system and monitors the assignment of these numbers.

Blu Oak Group restricts the ability for customers to input any TN other than those assigned to the account as outbound caller identity.

Blu Oak Group does not permit the use of TNs not directly managed by Blu Oak Group.

Analytics for Monitoring Traffic

Blu Oak Group works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If Blu Oak Group or its carrier partners detect a calling pattern consistent with illegal robocalls, we will identify the party and take appropriate action. 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 system.



Investigate Suspicious Activity

When traffic analysis or automated alerting via upstream provider indicates the presence of likely illegal robocalling, Blu Oak Group'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 and benchmark against expected trends
- investigating if any system issue generates the strange behavior
- verifying that the call originating path is valid
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

Blu Oak Group follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Blu Oak Group devotes sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

Blu Oak Group will implement Do Not Originate requests it receives from the ITG. Blu Oak Group has procedures to block suspicious calls. If Blu Oak Group identifies suspected robocalling patterns that are confirmed with further investigation, Blu Oak Group will take appropriate action which may include suspending or terminating the subscriber's use of Blu Oak Group's systems. Blu Oak Group will cooperate with investigative bodies, provide a single point of contact to address traceback requests from law enforcement, including state attorneys general offices, FCC, and ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Blu Oak Group will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Blu Oak Group will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.



Certification

I, Jesus Carrillo Jr, President of Blu Oak Group, Inc. ("Blu Oak Group") do hereby certify, under penalty of perjury, the following:

1. Blu Oak Group has fully implemented STIR/SHAKEN in the IP portions of its network
2. Blu Oak Group's business name and primary address are as follows:

Blu Oak Group, Inc.
4730 S Fort Apache Rd, STE 300
Las Vegas, NV 89147
3. Blu Oak Group has no other business names in use.
4. Blu Oak Group has not previously used any other business name.
5. The name, title, department, business address, telephone number and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
6. Blu Oak Group's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
7. Blu Oak Group has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
8. Blu Oak Group is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Jesus Carrillo Jr
President
224-601-5205