

Background:

- VoIPcloud Wholesale Inc, is a small voice service provider (with less than 1000 SIP lines) that is a pure reseller of other larger voice service providers (ITSPs).
- In this document, "VoIPcloud", "we", "us" or "our", refers to VoIPcloud Wholesale Inc and the services provided by it.
- VoIPcloud customers range from individual users to small and medium business with SIP lines and hosted PBXs.

1. Scope

VoIPcloud implements measures to mitigate unsolicited calls and fraudulent calls; and ensures all calls that originate on our network are subject to a robocall mitigation program meeting the FCC requirements (the "Mitigation Plan"). The Mitigation Plan specifies the actions required to avoid, identify and respond to such calls and to any measures concerning them taken by VoIPcloud.

VoIPcloud has some facilities that host the PBXs we use to serve our customers which are not sufficient to implement STIR/SHAKEN on the IP portions of our networks. For calls to the USA, VoIPcloud only operates with voice service providers that offer STIR/SHAKEN implementations.

2. Introduction

Following the requirements and rules adopted in the Sixth Caller ID Authentication Report and Order, including the additions of and revisions to 47 CFR §§ 64.6303(c), 64.6305(d), 64.6305(e), 64.6305(f) and 64.6305(g), VoIPcloud presents its Revised Robocall Mitigation Plan.

Unsolicited calls, robocalls and fraudulent calls represent a serious threat to the telecommunication industry and its customers. VoIPcloud analyzes and evaluates the risks facing the company and its business environment within the framework of VoIPcloud's risk management system. Consequently, clear policies and procedures for overall prevention of service abuse framework have been defined.

3. Responsibilities

The Compliance Manager and staff are responsible for verifying Customer accounts, authorizing access to services and monitoring account activity in conformity with the applicable laws and this plan.

The Technical Manager and staff are responsible for system monitoring in search of any abnormal activity.

4. Prevention and management of service abuse

The aim of this plan is to ensure that VoIPcloud is adequately equipped to protect its customers, brand, reputation and public interest from suspected or actual cases of service abuse or fraud. Management of unsolicited, robocalls or fraudulent calls mitigation plan consists of:

4.1. Proactive management

- 4.1.1. VoIPcloud only resells services from ITSPs that offer full STIR/SHAKEN implementation for its customers calls origination to the USA DIDs.
- 4.1.2. VoIPcloud has fully implemented the STIR/SHAKEN framework for all IP-based traffic.
- 4.1.3. VoIPcloud blocks calls intended to appear to originate from telephone numbers included on a Do-Not-Originate ("DNO") list.
- 4.1.4. Consistent with FCC robocall mitigation and call-blocking requirements, VoIPcloud employs network-based call blocking measures, including rejecting calls that are highly likely to be illegal, spoofed, or otherwise non-compliant

- 4.1.5. VoIPcloud refuses traffic from any voice service provider, gateway or non-gateway intermediate provider that is not listed in the Robocall Mitigation Database.
- 4.1.6. All our customers, connect to one of our hosted PBXs configured by us where we have full control of Caller IDs (CLIDs) used. Customers can't control any of these CLIDs. We ensure that CLIDs used are valid and owned by each of our customers.
- 4.1.7. "Know Your customer" (KYC) processes are in place to identify and validate an individual's identity and corporate information including verification of service address, phone number, government-issued ID and more.
- 4.1.8. To become a VoIPcloud reseller a contract administration process is followed that ensures they agree to comply with our policies regarding spam/scam and robocall activities and all industry regulatory compliance.
- 4.1.9. We have mechanisms in place to detect high network traffic, improper call patterns and abnormal irregular activity of call traffic and call flows which initiates a manual review process by our staff. Our staff will then take appropriate case-by-case action all the way up to account suspension or termination.
- 4.1.10. VoIPcloud prohibits the origination of any robocall traffic in our terms and conditions as clearly stated in our Fair Use Policy which is applicable to all our services: "Robocalling is strictly prohibited, non-compliance will lead to immediate account termination".
- 4.1.11. VoIPcloud is constantly improving our tools, process, education and monitoring to improve detection and reaction to reduce spam/scam and robocall traffic.
- 4.1.12. Regular audit of customer account activities to identify any suspicious or fraudulent behavior.
- 4.1.13. Employment of AI technology, where, if traffic anomalies are identified, it transcribes and notifies the team if high-risk keywords are identified.

4.2. Reactive management

- 4.2.1. VoIPcloud is committed to responding within 24 hours to all traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium. Participation in traceback procedures and cooperation with reporting entities is ensured. Moreover, VoIPcloud commits to collaborating with these entities in investigating and halting illegal robocallers involved in the origination, transmission, or processing of illicit robocalls. Additionally, VoIPcloud takes steps to effectively mitigate illegal traffic upon receiving notifications from the Commission's enforcement bureau and to implement robust measures preventing both new and existing customers from utilizing its network for illicit call activities.
- 4.2.2. Regular audit of customer account activities to identify any suspicious or fraudulent behavior.
- 4.2.3. Enforcement of service agreements and contracts to ensure compliance with policies regarding spam/scam and robocall activities. Corrective actions are taken in case of violations.
- 4.2.4. If it is determined a VoIPcloud service is engaged in spam/scam or robocall on our network, VoIPcloud take corrective actions to warn or terminate the associated account in line with policies that define the circumstances by which suspension or termination of service is applicable.
- 2.2.5. Collaborating with our ITSPs, we receive alerts regarding potential instances of illegal or fraudulent call patterns. In response, VoIPcloud take corrective actions to warn or terminate the associated account in line with policies that define the circumstances by which suspension or termination of service is applicable.

5. Contact information

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