

W1 Services, Inc.

Robocall Mitigation Plan

FCC Registration Number (FRN): [Insert W1 FRN here]

Address: 548 Market Street, PMB 95977, San Francisco, CA 94104, USA

Robocall Mitigation Contact:

Name: Jason Bales, President

Email: fcc@convergence.com

Phone: 858-752-3422

1. Introduction

W1 Services, Inc. provides VoIP services, including SIP trunking and hosted PBX solutions, to enterprise and wholesale customers. The Company is committed to protecting consumers and complying with the FCC's rules under 47 CFR §64.6305 to prevent unlawful robocalls. This Robocall Mitigation Plan outlines the technical and procedural safeguards W1 has adopted to ensure compliance.

2. STIR/SHAKEN Implementation

W1 Services has implemented STIR/SHAKEN caller ID authentication on the IP portions of its network in partnership with its SBC vendor (Sansay) and Sansay's hosted STIR/SHAKEN signing service. All outbound calls are signed using valid STI certificates issued by an FCC-approved Certificate Authority. Calls are assigned appropriate attestation levels (A, B, or C) depending on our ability to validate the customer and calling number.

3. Customer Vetting and Onboarding

W1 performs Know-Your-Customer (KYC) procedures before granting service. Verification includes legal business registration and EIN or government-issued ID, review of intended call use cases, expected volume, and traffic patterns, as well as screening against fraud and reputation databases. Customers with high-risk profiles are subject to enhanced scrutiny or denial of service.

4. Traffic Monitoring and Analytics

W1 actively monitors call traffic for potential unlawful robocalls, including abnormal call durations and completion rates, unusual spikes in traffic volumes, and excessive calls-per-second activity. Automated systems generate alerts and can block or rate-limit suspicious traffic while compliance staff investigates.

5. Traceback Cooperation

W1 cooperates fully with the Industry Traceback Group (ITG) and law enforcement. The Company commits to responding to traceback requests within 24 hours. A designated compliance officer (listed above) is responsible for ensuring timely responses.

6. Remediation Procedures

If unlawful traffic is suspected, W1 immediately suspends or rate-limits the traffic, notifies the customer, and investigates the source. Customers unable to demonstrate compliance are terminated and permanently barred from the network.

7. Affiliates and Subsidiaries

W1 Services, Inc. operates independently and does not currently have affiliates or subsidiaries that provide voice services requiring separate certification. Any future affiliates will be disclosed and certified as required.

8. Compliance Commitment

W1 Services, Inc. understands that non-compliance may result in removal from the Robocall Mitigation Database and mandatory call blocking by downstream providers. The Company is committed to ongoing compliance with FCC regulations, continuous monitoring of its traffic, and cooperation with industry and government partners to prevent unlawful robocalls.