



Robocall Mitigation Plan

VoiceLogix has implemented the following Robocall Mitigation Plan to detect and prevent unlawful robocalls from originating on its networks.

VoiceLogix is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. VoiceLogix has not been prohibited from filing a certification in the Robocall Mitigation Database. VoiceLogix does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

VoiceLogix uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Customer Verification (Know Your Customer)

VoiceLogix has a process in place to confirm the identity of new subscribers as part of an application for service or a new service contract. At the time service is established a confirmation of the identity is established via a driver's license, credit check or photo ID card. VoiceLogix is in the process of expanding the terms of service to clarify that the use of telephone numbers for illegal robocalls is prohibited and that consequences will be enforced.

Upstream provider Verification (Know your Upstream Provider)

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

RoboCall Mitigation Program

All calls that originate on VoiceLogix network are subject to the described robocall mitigation program. VoiceLogix has implemented a Call Authentication Framework to detect and mitigate originating robocall traffic. This includes 3rd party analytics software to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

We perform the following as part of our framework:

- Our automated system alerts us if we process outbound calls where the calling number has a poor reputation, is invalid, unallocated, or on a Do Not Originate list.
- Outbound Traffic is monitored for abnormal call patterns or call durations that are consistent with robocalling.
- We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 476K. We have our own STIR/SHAKEN certificate issued by a Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution against all traffic.

Traceback

VoiceLogix is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers. VoiceLogix will respond to any traceback requests from the traceback Consortium within 24 hours from the time of request and will comply with any change requests within a reasonable time frame.

Enforcement

If VoiceLogix has a reasonable basis to believe that a customer is originating illegal robocalls, we require the customer to remedy the problem and, if effective action is not taken, VoiceLogix may suspend and/or terminate service to the customer.