



Net2 Atlanta LLC

ROBOCALL MITIGATION PLAN

Robocall Mitigation Plan Document

Pursuant to 47 C.F.R. § 64.6305 Net2Atlanta.com LLC submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Net2Atlanta.com LLC (hereinafter also referred to as “Net2Atlanta” or “the company”) has in place to mitigate illegal robocalls. The company may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

Net2Atlanta does not have contracts, but notifies its customers that it will deny, suspend, or terminate service to a customer if they participate in any robocall or fraudulent traffic. Net2Atlanta confirms that its upstream providers have a certification in the Robocall Mitigation Database. The company will not accept voice traffic from an unregistered provider. The Company has been informed of the upstream provider “Know-Your-Customer” guidelines and have provided them with the necessary KYC documentation they’ve requested that the company completes.

Net2Atlanta follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. Net2Atlanta also validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. The Company uses this information to support the attestation level it assigns to calls that it originates for that customer.

Net2Atlanta contractual provisions with customers prohibit them from initiating illegal robocalls. If the Company discovers a customer is initiating suspicious robocalls, it warns them to stop. If such traffic continues, then the Company terminates their service.

Net2Atlanta requires that upstream providers have a reasonable Robocall Mitigation Plan, including a vetting process for their customers as well as their upstream providers, and that they use call analytics to identify suspicious traffic. Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company uses a KYCs to confirm the following information for its customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls
- Service Address

When the customer is a business, Net2Atlanta also requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

Net2Atlanta uses Sangoma to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

Net2Atlanta will immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If the Company determines that the traffic was likely unlawful, then the company will warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then the company will terminate their service.

Net2Atlanta will comply fully with all conditions set forth in the FCC'S 2024 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Net2Atlanta has designated an individual as a dedicated point of contact for addressing traceback requests. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>. The Company will respond promptly to inquiries from the Industry Traceback Group (ITG) within 24 hours.

If a pattern of questionable activity is detected, Net2Atlanta will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Requests from the ITG must be submitted in writing and include the following information:

Phone Number in Question:

Phone Number Dialed

Date / Time Stamp

Requestor's Name:

Requestor's Title:

Requestor's phone number:

Requestor's e-mail:

Net2Atlanta will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated Robocall Mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls. The company will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. The company will cooperate fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls.

Requests from the valid agency must be submitted in writing and include the following information:

Law Enforcement Agency Name:

Agency Address:

Requestor's Name:

Requestor's Title:

Requestor's phone number:

Requestor's e-mail:

Net2Atlanta performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. The Company has not had any agency action or investigation due to suspected unlawful robocalling or investigations.

Net2Atlanta is not subject to any Commission, Law Enforcement, or Regulatory Agency Action or investigation due to suspected unlawful robocalling or spoofing. The company has not had any complaints.

Net2Atlanta does not wish to publicize any private and/or classified information that has the potential to expose the Company to fraud and/or anti-competitive actions. Therefore, the Company will submit a redacted version for the public site and requests that the FCC keep the unredacted version CONFIDENTIAL

Contact Information

Net2 Atlanta LLC

<https://www.net2atlanta.com/> | 3780 Old Norcross Rd Suite 103 Box 108 Duluth, GA 30096 | 678-560-8076