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Robocall Mitigation Plan

Version 1.2 – March 2026

JVOIP LLC (“JVOIP” or “Company”) is a VoIP service provider with fewer than 100,000 end users, operating as a voice service provider.

Pursuant to the provisions of 47 C.F.R. § 64.6305 (as amended effective February 26, 2024), adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan” (RMD), this document sets forth the Company’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network.

We perform the following roles in the call chain:

- A **voice service provider** with a completed STIR/SHAKEN implementation obligation serving end-users.

In addition,

- The Company’s upstream/downstream providers for inbound and outbound traffic has completed its complete STIR/SHAKEN implementation.
- All calls initiated by the company adhere to the requirements set forth in §64.6301(a)(1) and (2).
- The Company is committed to actively eliminating the ability of its customers to participate in any form of illegal activity.
- The Company has not been prohibited from filing a certification in the Robocall Mitigation Database.
- The Company does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

- The Company uses the following affirmative and effective measures to prevent the origination or transit of illegal robocalls.

I. STIR-SHAKEN Implementation Status

JVOIP originates all calls using SIP connections within its own network. JVOIP has registered with the Policy Administrator (STI-PA) and is an authorized service provider in the STIR-SHAKEN ecosystem with **OCN 419K** issued by NECA on September 30, 2022.

JVOIP has implemented STIR-SHAKEN within its IP network and signs the calls originating on the IP portions of JVOIP's network. Our Certificate is issued by Telonium, an authorized Certificate Authority (STI-CA) approved by iConectiv.

II. Know Your Customer

The Company follows best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group including but not limited to subscriber vetting and outgoing caller identity validation.
(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

The Company also validates, wherever possible, that the entity has a legitimate right to use its asserted calling numbers. This information is used to support the attestation level assigned to calls that are originated for that customer.

In the event of any violation of the Company's terms of service or acceptable use policy, customers are warned and eventually terminated if they fail to comply.

III. Traceback

Traceback Point of Contact:

- Martha Villagomez – (980) 441-6120, Option 2.

JVOIP is fully committed to respond within 24-hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

IV. Robocall Mitigation Program

JVOIP uses software and services provided by three major downstream/upstream providers to monitor our voice traffic in real time to prevent the origination of illegal robocalls. Our providers are fully STIR/SHAKEN compliant and listed in the RMD with status “Complete STIR/SHAKEN Implementation”.

The Company’s Underlying Provider(s), Upstream Carriers are:

- Peerless Network Inc. (RMD0001419)
- Telnyx, LLC (RMD0001645)
- Questblue Systems, Inc. (RMD0005852)

We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls.

Our software, in conjunction with our interconnects, includes a reputation score-based analytical system to prevent fraudulent calls, scammers, or spammers. The software is a call analytics solution that uses cross carrier real-time call events, combined with crowd-sourced data, to create accurate and comprehensive reputation profiles differentiating legitimate users of communications services from abusive, fraudulent, and unlawful users.

If we determine that the caller attempts to originate unlawful robocalls, we either warn them to stop or terminate their service as appropriate.

The following measures are acted upon in the event of suspect illegal robocalls:

1. Monitor systems for any traffic congestion or variations in call volume made from a customer or endpoint.
2. Immediately react to any complaints from upstream carriers by investigating and blocking calls from a customer found to be in violation.
4. Detect fraudulent call patterns and monitor for non-human call volumes.
5. Immediately block known fraudulent callers, scammers or spammers if reputation score thresholds exceed our acceptable limits.

5. Throttle abuse and delete fraudulent accounts after that.

V. Acceptable Use Policy

The following policy on call use is published on our website and all customers have been notified:

“Any call originated on JVoIP LLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from JVoIP LLC network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”

CONCLUSION

The Company submits this cured robocall mitigation plan, to comply with the Enforcement Bureau of the FCC.