

Robo Call Mitigation Plan

This document outlines the comprehensive strategies and actions implemented by Imperial Technologies DBA Imperial Voice to mitigate and eliminate unlawful Robo Calling activities. Imperial Voice, a voice service provider with fewer than 3000 subscriber lines, relies on robust customer verification methods, advanced call monitoring technologies, and collaborative initiatives to ensure the legitimacy of calls and prevent illegal activities.

Customer Verification

Imperial Voice employs a stringent customer verification process. New residential customers are authenticated using Social Security Numbers paired with soft credit checks or letters of reference from other utility providers. Business customers are validated using Tax Identification Numbers and soft credit assessments.

Traffic Monitoring and Technological Tools

Imperial Voice utilizes TNS Call Guardian Authentication Hub analytics to scrutinize network traffic and detect potentially illegal call activities. This managed service offers real-time reputation scoring and analytics to combat both incoming and outgoing robocalls. The company reviews daily reports generated by Call Guardian analytics and undertakes appropriate actions based on these reputation scores.

STIR/SHAKEN Implementation

Imperial Voice operates on both IP and non-IP networks. On IP networks, Imperial Technologies adheres to the STIR/SHAKEN implementation obligation

Full Attestation (A): Caller is authenticated, and the origin is verified.

Partial Attestation (B): Caller is authenticated, but the origin cannot be fully verified.

Gateway Attestation (C): Caller identity cannot be verified but is received from an intermediary network.

Robocall Mitigation Enforcement

To reinforce its mitigation measures, Imperial Voice blocks calls identified as illegal Robo calls and if required may terminate services entirely. All telephone numbers flagged for illegal Robo calling are reported to the FCC and FTC.

Upstream Providers and Compliance

Imperial Voice maintains thorough knowledge of all carriers from which it receives traffic and ensures that all affiliated carriers are listed in the Robo Call Mitigation Database (RMD). It reviews carriers' Robo Call Mitigation Plans (RMPs) to understand their procedures for monitoring originating traffic. Imperial Voice incorporates language on traceback and prohibited traffic in its contractual agreements with upstream carriers and does not receive traffic directly from foreign providers.

Collaboration and Traceback Participation

Imperial Voice is dedicated to collaborating with regulatory bodies, law enforcement, and industry traceback consortiums to stop illegal Robo Calls. The company pledges a full and timely response to traceback requests, typically within 24 hours. Furthermore, Imperial Voice

ensures compliance with traceback and enforcement directives by maintaining stringent communication protocols.

Customer Education

The company takes proactive measures to educate its customers about Robo Call mitigation. Information regarding its mitigation plan and educational resources are emailed to customers. Customers are encouraged to register with the Do Not Call Registry during service sign-ups, and further information is provided through periodic bill stuffers.

Exempt from this obligation as they utilize technology incompatible with initiating, maintaining, carrying, processing, and terminating SIP calls.

Parent, Affiliates, and Subsidiaries

Imperial Voice's organizational structure includes several subsidiaries under its parent company, ensuring consistent and comprehensive implementation of robo call mitigation measures across all entities. Key personnel such as the CEO and CTO plays pivotal roles in managing and enforcing these policies.

Overall, Imperial Voice demonstrates a robust commitment to mitigating illegal robo calls through a combination of customer verification, real-time monitoring, strict enforcement of policies, and active collaboration with regulatory and enforcement bodies. The use of advanced analytics and educational initiatives further strengthens its efforts to maintain the integrity of its services.