



ROBOCALL MITIGATION PROGRAM

About Odigo

Odigo is a Contact Centre as a Service provider based in France, but with an international footprint.

Odigo is a leader on the European market and has been recognized as a Visionary in the 2021 Gartner Magic Quadrant for CCaaS.¹

Our customers are French large companies and public sector customers with significant needs in terms of customer care, for the most part.

As such, Odigo provides its customers with telephone numbers across the world to enable them to be reached by their own customers, and conversely.

Odigo has a point of presence in the US, which enables it to provide numbers from the NANP to its customers by handing over international traffic to its local voice partners for termination in the US.

STIR/SHAKEN

Odigo does not currently implement a STIR/SHAKEN solution because Odigo is a foreign voice service provider without a presence nor a network in the US. Furthermore, Odigo only resells services in the US and has no control over the network infrastructure necessary to implement the STIR/SHAKEN framework.

Reasonable steps taken to avoid carrying illegal robocall traffic: our robocall mitigation program

Odigo's strategy in ensuring the lawfulness of its voice traffic is based on three pillars: knowing our customers, knowing our telco partners, and monitoring our network.

1. Knowing our customers

Odigo's voice traffic is legitimate and lawful by default as our customers are large and reputable companies in the private and public sectors, and who do not engage in unlawful or otherwise unwanted behavior. They are all regulated in their own industry sectors.

Any calls originated on our network and which are made to the US using our software are initiated by a human customer service agent, to a person who is their existing customer.

Furthermore, our product does not currently enable our customers to engage in predictive dialing nor to use auto dialing features. This excludes the possibility of originating any traffic resembling robocalls on our network.

Therefore, none of the voice traffic Odigo hands over to its voice partners in the US qualifies as robocall.

Further, Odigo does not market its services in the US market. Odigo contracts with customers in Europe, some of which have branches in the US which require Odigo to provide the same service which their European counterparts receive from us.

Finally, all of Odigo's customers undergo strict KYC checks. In particular, any request for the assignment of a telephone number is subject to such checks which cover at least the following:

- Company registration documents
- Proof of address
- Contact name
- Identification documents

2. Knowing our telco partners

¹ [Odigo recognized by Gartner in the 2021 Magic Quadrant](#)



Odigo relies on international and regional transit providers to collect and terminate traffic in certain countries where our customers require services.

The choice of these telco partners is done at board level and we only entrust our traffic to reputable and well-known providers who commit to monitoring their own networks for fraudulent traffic.

Our contracts contain provisions which mutually incentivize the parties to mitigate robocalls, namely by applying penalties and/or blocking traffic when fraudulent traffic is detected.

3. Monitoring our network

Odigo monitors its own network to identify and block suspicious traffic. In the US, we rely on our transit providers' to carry out the same monitoring activities and alert us should this ever be the case, to enable us to block fraudulent traffic Odigo.

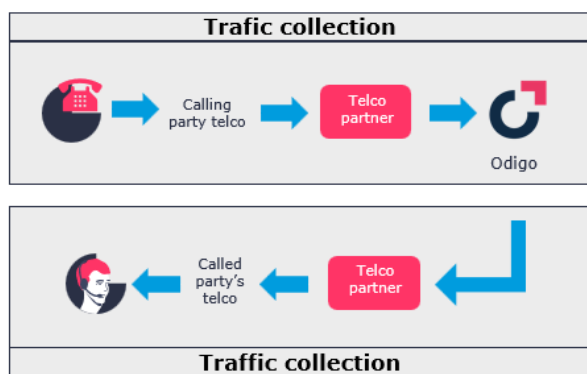
Any unlawful or fraudulent traffic is also investigated by Odigo.

Our role in the call chain

As per the diagrams below, Odigo is not a local loop operator. Our role is to provide the virtual contact center service in between, which connects both parties to a call.

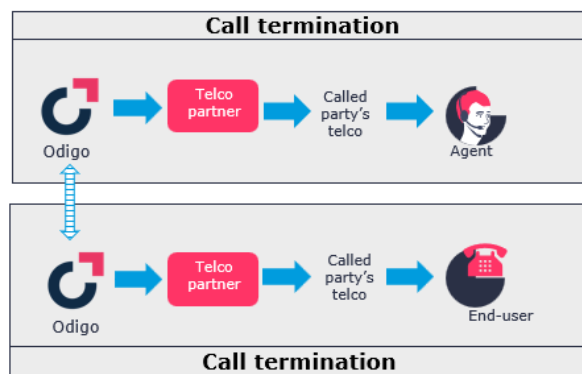
Incoming call

Incoming call collected by Odigo then routed a customer service agent



Outgoing call

Customer service agent calling an end-user (2 calls spliced into 1)



Statements

Odigo certifies that it has not been prohibited from filing in the Robocall Mitigation Database.

Odigo certifies that that it is not subject to a Commission, law enforcement or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Odigo certifies that it has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting or otherwise facilitating illegal robocalls or spoofing.

Odigo commits to respond to traceback requests from the Industry Traceback Group within 24 hours of such a request, to block illegal traffic when notified by the Commission and to adopt the Commission's 'Know Your Upstream Provider' requirements.

Queries may be addressed to regulation.odigo@odigo.com.