

Robocall Mitigation Plan

This robocall mitigation plan is for nSpeak LLC, with headquarters at 15 Bryant Ave., Suite #100, Roslyn, NY 11576. We are a voice service provider offering outbound VoIP services providing hosted PBX solutions.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- Our downstream carrier is VoIP Innovations (RMD0004048) who currently sign our end user originating calls with our SPC issued by the STI-PA using Sansay as our STI-CA.

On August 25th 2025, nSpeak LLC was removed from the FCC Robocall Mitigation Database (RMD) due to administrative non-compliance. Notices sent by the FCC were mistakenly marked as SPAM by our email filters and therefore went unanswered. The Company failed to file its required robocall mitigation certification within the mandated timeframe. Despite maintaining full technical compliance with STIR/SHAKEN requirements and operating an active robocall mitigation program, the Company did not update its RMD filing as required by FCC regulations, resulting in automatic removal from the database. Upon notification of the removal, we corrected all deficiencies and were Provisionally re-instated by the Enforcement Bureau on August 29, 2025. On November 19, 2025, the Enforcement Bureau notified us that our KYC description was not sufficiently detailed and required updating. That deficiency is corrected in the below description.

nSpeak LLC does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

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

Know Your Customer

We follow 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 (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>).

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by Sansay and VoIP Innovations to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls when our implementation is complete.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

Combining behavioral analytics, caller authentication and verification, our solution features:

- ☐ **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
- ☐ **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- ☐ **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- ☐ **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- ☐ **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- ☐ **Do Not Originate:** We currently use the reasonable DNO list provided by iconectiv.

We immediately investigate any identified suspicious calls to determine if the caller 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 527K. We have our own STIR/SHAKEN certificate issued by the Sansay Certification Authority (STI-CA) that is used by VoIP Innovations when authenticating calls we originate. Our downstream carrier hosts our SPC and signs our originated calls.