

Avoira Limited

Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted Avoira Limited pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal

Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

I. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, the Provider’s status with respect to STIR-SHAKEN implementation is as follows:

The Provider is an Intermediate Provider under a Master Service Agreement with Bandwidth who has implemented the STIR/SHAKEN authentication framework on its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Provider’s service to originate illegal robocalls.

II. TRACEBACK REQUESTS

The Provider will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback 1 request received within 24 hours after receiving the same. Within Appendix A to this Plan, the Provider identifies a single point of contact for receiving all traceback requests.

III. CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, the Provider will use best practices in vetting the identity of all of its subscribers. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of

establishing a service relationship. Generally, the Provider looks to confirm the identity of customers using its services through collecting information such as physical customer location, contact person(s), and the nature of the customer's business. Provider efforts to vet retail and business/commercial subscribers occurs during the process of provisioning customer requested services, executing the Provider's required service agreements, and granting the customer the right to utilize our service.

Utilizes service agreements and acceptable use policies as a means of preventing its new and existing subscribers from using services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of Provider provided services include terms indicating specifically to all customers that their services should not be used for the purpose of making illegal robocalls, and the Provider reserves authority within its service agreements to suspend or terminate a subscriber's service for violating applicable service-related terms.

Has established a routine process for monitoring usage and quality and conducts recurring and timely reviews of call data to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate unauthorized use. In those instances where the Provider identifies activity or a pattern consistent with illegal robocalls the customer will be contacted within twenty-four hours for further investigation and possible action regarding their subscribed service.

IV. INTERNATIONAL CALL ORIGINATORS

The Provider is not currently an international voice services provider. If at any time the Provider does

sell its services to customers which are international call originators using North American Numbering Plan resources it will familiarize itself with and develop best practices for fully vetting such customers and performing telephone number validation on all international originated calls.

V . KNOW YOUR UPSTREAM PROVIDER PROCEDURES

As a limited provider of voice services, we use a single upstream provider (Bandwidth) to receive and deliver its originated voice calls for termination. The Provider has a longstanding relationship with this upstream provider and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services.

Further, the Provider, in the interest of providing the highest quality services to all of its voice service customers, is committed to taking steps necessary to ensure monitoring and preventing their use for the transmission of illegal robocalls.

VI. ONGOING ROBOCALL MITIGATION PRACTICES

The Provider monitors the usage of its services and examines call data on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns would appear to be consistent with illegal robocalls are detected or the Provider otherwise suspects illegal robocalling or spoofing is taking place on its network, it immediately seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action. The actions taken may include, but are not limited to: initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name; terminating the party's ability to originate, terminate, or route calls on the Provider's network; and providing notice to law enforcement authorities. As part of its plan to mitigate and prevent any originating robocalls, the Provider is committed to early identification and investigation of possible robocalling situations.

Appendix A

Traceback Request Single Point of Contact

Name: Jon Allen

Title: Presales

Phone: +44 161 527 5812

Email: Jon.allen@avoira.com

Upstream Provider Information

Name of Upstream Provider: Bandwidth