

Robocall Mitigation Program for Voicespin Ltd

Overview/Company Information

Voicespin Ltd is committed to combatting the spread of illegal robocalls, in accordance with FCC rules and regulations. The purpose of this plan is to outline our procedures and protocols designed to prevent the origination of illegal robocalls through our network.

Voicespin Ltd serves as a leading global provider of cloud-based unified communications and Linux-based IP communication solutions. VoiceSpin serves over 500 large international enterprises, high-tech corporations, private companies, and communication brands in e-commerce, trading, finances, government, law, and more.

Voicespin Ltd provides services to fewer than 100,000 voice subscribers worldwide.

Policy

Voicespin Ltd has a policy against illegal robocalls. We do not originate, promote, or condone the use of robocalls in violation of FCC rules or regulations, and we make diligent efforts to prevent such calls from being made through our network.

Know Your Customer

Voicespin Ltd vets our new and renewing customers. When customers apply for service, we gather contact information, social security numbers, and driver's license numbers using Online Identity Verification & Orchestration Service Sumsub. This service can highlight age, address, and name discrepancies. If the customer applies in person, a photo ID is requested to verify the applicant's identity. Perform liveness and Face Match verification to confirm true document holder identity.

All our customers have a bespoke solution design, our customers cannot sign up for our service without our understanding and approving the use case. We do not offer online automatic signup.

Traceback

Voicespin Ltd commits to respond to all traceback requests from the FCC, law enforcement, and the industry traceback consortium (US Telecom). We will cooperate on a timely basis with such entities to investigate and stop any illegal robocallers that use our network to originate calls. If one of our customers determines that their number has been spoofed and reports it to our staff, we will initiate a traceback request with the industry traceback consortium. Voicespin Ltd will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

Robocall Mitigation Program

All voice traffic that originates on the network is subject to the following Robocall Mitigation Plan. Voicespin Ltd has implemented a robocall mitigation program stopping any illegal robocalls that would

use Partner's service to originate calls. As part of Partner's mitigation program, all robocall-related inquiries from the FCC, law enforcement, or the industry traceback consortium will receive a timely response. Specifically, all lines and trunks served on Partner's network are provisioned with a single telephone number or a specific set of telephone numbers. These telephone numbers have been assigned only for the use of lines provisioned for that specified customer. All calls originated by any customer on Partner's network must carry a Caller ID limited to one of the telephone numbers specifically assigned to that customer. Any attempt to use a number not assigned to that customer when originating a call will be blocked by Partner's network as a result of these controls. This blocking occurs when a customer attempts to use a telephone number for which it has not been assigned, whether the attempt was made directly by the customer or as a result of some malicious intrusion of the customer's equipment.

The following is an outline of steps deployed to co-combat the termination and origination of illegal robocalls:

- 1) Voicespin Ltd monitors the network for high-volume voice traffic to identify suspected robocall patterns. We throttle our customer's maximum calls per second to ensure our customers cannot generate high levels of traffic outside of their normal expected business use. If any patterns are discovered, the NOC team will work to identify the party using our network to originate the calls and take appropriate action such as
 - a) verifying that the originating customer is valid and authorized to use the number;
 - b) blocking, suspending, or terminating the subscriber from our network;
 - c) notifying the FCC, law enforcement, and the industry traceback consortium.
- 2) Voicespin Ltd can identify the specific customer that originates any call on its network, and all originating telephone numbers are vetted at the time of service installation and associated with a physical address and responsible party. Our customers can only display caller IDs that we have approved and associated with their accounts. Customers are not permitted to set any CallerIDs outside of this approved list.
- 3) Once per week an updated FCC Do Not Call list is automatically loaded and applies to all outbound traffic where we can configure a global list from our subscriber's blocked lists.
- 4) These numbers are then greeted with a blocked recording, effectively ending the call:
"The number you have reached does not accept calls from Telemarketers. If you are a Telemarketer, please hang up now. Otherwise, please press 1". Since live telemarketing callers have to press "1", to complete the call, automated dialers will merely timeout without ever ringing the subscriber's phone.
- 5) Customers have the options:
 - a) "Do not disturb" functions
 - b) "Call screening" functions
 - c) can manage their own allowed/blocked lists on Cloud PBXs,

Further, Voicespin Ltd can identify the specific customer that originates any call on its network. Thus, the company is prepared to respond to any inquiries regarding any calls that have originated on its network and meet its obligations pursuant to 47 CFR 64.6305.