

Wavly Inc - Robocall Mitigation

We will adhere to the latest laws, regulations for preventing our system from being used for robocalls.

Implementation and Solution:

Robocallers are able to be identified positively in our system because we put rules in place to ensure that Caller-ID is not allowed to be spoofed to the PSTN. Our system requires each customer to only use only a real phone number that they actually own, to make outbound calls to the PSTN. The system is designed to NOT allow calls to go out with spoofed caller id, or without caller id, as our system is meant for businesses and not personal use. In short, no call can go out to the PSTN (public switch telephone network) without a telephone number matching that owned by the customer.

We have monitoring and reporting systems in place to look at high-volume traffic to the PSTN network, which alerts us to calling patterns, spikes, and suspicious activity. For example, we will look at calling patterns such as (short duration calls with low completion rates). We will then investigate and present this to the customer for an explanation. Once illegal robocalling or spoofing is taking place, we will seek to verify the identity of the party, require the customer to identify themselves with proper legal identification for security, and take appropriate action, including suspending or blocking the offending party from making calls, or blocking of the entire account where applicable.

For outbound calls: Our upstream outbound gateway provider, has implemented full Stir and Shaken, and can be traced. From there, our upstream provider will be able to verify all the positive identification of all callers from our network as an accurate traced, since we ensure through an intentional and careful designed as discussed above, that the caller using that telephone number is indeed the owner/account holder of that telephone number, as no caller-id is allowed to be spoofed from our system. From our end, we design monitoring and protection features to identify and block robocalls from originating through our system.

For inbound calls: Our upstream inbound gateway provider, has implemented full Stir and Shaken, and can handle blocking of known robo-caller networks not authenticated with Stir and Shaken. On our end, we will detect unusual inbound based on repeated call-id patterns over a duration of time to the aggregate of our customers, and apply our own filtering and blocking to protect our customers.

Traceback Cooperation:

Wavly Inc will respond in a timely manner and support all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).

Principals with greater than 10%

Jonathan W Li

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