

Agile Telephony Inc.
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Robocall Mitigation Plan

Overview

The FCC requires that all small voice service providers (“VSPs”) certify in the Robocall Mitigation Database that they have implemented a Robocall Mitigation Plan (“RMP”) to ensure that they are not originating illegal robocalls.

The FCC requires that VSPs develop a RMP that:

- Details the reasonable steps taken to avoid originating illegal robocalls;
- Demonstrates a commitment to respond to traceback requests to cooperate with investigators and stopping illegal robocalls; and
- Is filed in the Robocall Mitigation Database.

The FCC states that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Agile Telephony, Inc. is dedicated to stopping illegal calls originating in our network and monitors the calls coming into our network. This document describes Agile Telephony’s RMP.

Know Your Customer (“KYC”)

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Agile Telephony in which we transmit, originate, and/or terminate calls on behalf of the subscriber.

At the time of sign-up, subscribers are required to fill in their physical location, contact person and phone number. If applicable, Agile Telephony asks for their business website and other social media links, if any. A company representative manually checks the website of the customer before the account is confirmed. Sometimes the company representative goes through social media links such as LinkedIn and Instagram. Depending on the outcome, the company representative will confirm the account and proceed with on boarding the subscriber. The company representative can also use a 2fa code to verify the subscriber if needed.

Acceptable Use Policy (“AUP”)

Agile Telephony maintains an AUP that subscribers must sign before being permitted to use our service. Among other things, the AUP prohibits: (a) providing false identity or falsifying the origin of a message or phone call, (b) violating any applicable law or industry-accepted guidelines, (c) using Agile Telephony for

fraudulent activities or bypassing phone identification systems and (d) engaging in spam or unsolicited marketing or harassing messages.

Filtering

Agile Telephony has implemented technical solutions to ensure only phone numbers that are owned or managed are allowed to enter or exit our networks. This is accomplished by filtering and discarding any traffic that not from a known, verified Agile Telephony subscriber.

Investigate Suspicious Activity

Upon detecting suspicious subscriber activity, Agile Telephony investigates and notifies the offending subscriber. Unless Agile receives the legitimate use case (if any), the account is suspended. If the use case is considered to be fraudulent, i.e., if the offending party has not responded or has not been able to show its legitimacy, the account is closed.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Agile Telephony will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue. In the event of any material change to this plan, Agile Telephony will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.