



CLEVER IDEAS INC.

Robocall Mitigation Plan

Robocalls, or automated telephone calls, have become a significant nuisance and concern for both consumers and the telecommunications industry. In response to this problem, the Federal Communications Commission (FCC) has implemented regulations to mitigate robocalls and protect consumers from unwanted and fraudulent calls. Clever Ideas, Inc. ("Clever Ideas") has deployed advanced network monitoring systems to identify and analyze call patterns, volumes and anomalies associated with robocalls and implemented this robocall mitigation plan to take measures limit the transmission of unlawful robocalls to be terminated in the United States.

All the calls that Clever Ideas carries or processes on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.63.6305(c) and § 64.6302(c). Clever Ideas has implemented an authentication framework which only receives authenticated calls directly from providers which are registered in the Robocall Mitigation Database and with Complete STIR/SHAKEN Implementation. In addition, Clever Ideas' Mitigation Plan includes the following:

Subscriber Vetting

Clever Ideas takes reasonable steps to vet its customers as part of the service initiation process. Clever Ideas' customers are typically small businesses, which, as recognized by the *Best Practices for the Implementation of Call Authentication Frameworks* (Section 3.1.3) present low risk for perpetrating illegal robocalls. As part of its service initiation process, Clever Ideas requires information to identify the potential customer, including, legal business name, address, website, contact person's name, position, email and telephone number. Clever Ideas further inquires about the nature of the business, the type of persons (businesses or consumers) to be contacted and main purpose of communications (to be made and received) using Clever Ideas' services, among other things. This allows Clever Ideas to screen and reject suspicious applicants for its services. Customers that activate services with Clever Ideas acknowledge and agree that they are prohibited from abusive, fraudulent or unlawful use of the services.

Authentication, Call Filtering, and Blocking

Clever Ideas has robust programs and systems to filter calls and prevent illegal robocalls on its services. During the service integration process, customers identify their authorized users, locations and IP addresses to customize their call treatment preferences based on caller ID information. Clever Ideas' monitoring systems only allow call initiation and service access to those duly identified by the customer and restricts all other call initiation attempts. In this way, call initiation attempts from non-authorized users, IP addresses or locations are automatically blocked.

In addition, to activate services with Clever Ideas each customer must configure the characteristics of its use of the services, such as, average call duration, call volumes and timeframes to place the calls, including sequential dialing, number of call limits, and Do not Call List. Calls and call patterns inconsistent with the preestablished configuration are automatically blocked by the Clever Ideas systems.





These measures effectively pre-empt and limit potential illegal robocalls. Plus, Clever Ideas uses best efforts to monitor calling traffics that may be indicative of caller ID spoofing or robocalling which may be indicated by excessive short duration calls, spikes in call volumes, indication that the call initiator is not authorized to use the DID or does not match the customer's corporate name.

Cooperation with Traceback Requests, Law Enforcement, and Government Agencies

Clever Ideas is committed to and has the capability to fully cooperate and respond to traceback requests within 24 hours and to cooperate with the Industry Traceback Group, government agencies and law enforcement in investigating and stopping any illegal robocallers that use its service to originate calls.

Ongoing Monitoring and Improvements

Clever Ideas is committed to continue doing its part to prevent and mitigate illegal robocall traffic by taking the following steps:

- Regularly analyze the reported data to identify new robocall trends.
- Update the database of known robocall numbers and patterns to improve the effectiveness of call filtering and blocking mechanisms.
- Collaborate with other telecommunication companies, industry associations, and law enforcement agencies to share information, best practices, and coordinate efforts to combat robocalls effectively.
- Monitor the evolving robocall landscape and adapt mitigation strategies accordingly.
- Invest in research and development to explore new technologies and methodologies for more robust robocall mitigation
- Conduct regular assessments to ensure ongoing compliance and identify areas for improvement.

