

GRAHAM LIMITED Robocall Mitigation Plan

Know Your Customer

We follow the best practices for vetting users requiring email and personal details to be provided. We also ensure that they are not sending spam calls or using a call center with our inbuilt technology.

Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

STIR/SHAKEN Extensions

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

We use inbuilt software provided by our NOC to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts us if we originate any calls where the calling number is invalid, unallocated or has a poor reputation. We immediately investigate any identified calls to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.