



Robocall Mitigation Plan - Flow VOIP

At Flow VOIP, we are dedicated to upholding the highest standards of communication integrity and security. In compliance with regulatory requirements and industry best practices, we have developed a comprehensive robocall mitigation plan tailored to address the evolving landscape of telecommunication threats. Below, we outline the specific measures we have implemented to prevent the origination, carrying, or processing of illegal robocall traffic, as well as our adherence to the know-your-upstream provider requirement outlined in section 64.1200(n)(5) of the Commission's rules.

- Regulatory Compliance:
 - Flow VOIP strictly adheres to all relevant laws and regulations governing robocalls, including the Telephone Consumer Protection Act (TCPA) and the Truth in Caller ID Act, ensuring full compliance with legal requirements.
- Advanced Robocall Detection and Prevention:
 - We utilize cutting-edge call analytics and machine learning algorithms to detect and prevent robocalls in real-time, thereby safeguarding the integrity of our network.
- Caller ID Authentication:
 - Our network supports Caller ID authentication and verification mechanisms, such as STIR/SHAKEN, to authenticate the origins of calls and deter fraudulent activity.
- Whitelisting and Blacklisting:
 - Flow VOIP maintains meticulous whitelists of trusted numbers and organizations, while actively managing blacklists to block known robocallers and suspicious callers.
- Rate Limiting and Anomaly Detection:
 - We implement rate limiting on outgoing calls and utilize anomaly detection algorithms to identify unusual call volume patterns, key indicators of robocalling.
- Know-Your-Upstream Provider Procedures:

- Flow VOIP ensures compliance with the know-your-upstream provider requirement by implementing procedures to verify the legitimacy of upstream providers involved in call traffic. KYC procedures are also detailed below.
- Call Analytics Systems:
 - We utilize sophisticated call analytics systems to identify and block illegal traffic, enhancing our ability to mitigate the impact of robocalls on our network.
 - In addition to these specific mitigation practices, we further outline our commitment to transparency and continuous improvement:
- Customer Education: Flow VOIP educates customers on the risks of robocalls and provides guidance on configuring call settings to minimize their impact.
- Collaboration and Reporting: We collaborate with industry partners to share information about known robocallers and threats, and offer customers a mechanism to report suspected robocalls for prompt review and action.
- Performance Metrics and Feedback Loop: Flow VOIP establishes key performance indicators (KPIs) to measure the success of our mitigation efforts and actively solicits feedback from customers and employees to refine and enhance our approach.

Know Your Customer (KYC) Process

At Flow VOIP, we prioritize regulatory compliance and customer security. Our Know Your Customer (KYC) process ensures that we have verified the identities of our customers, in accordance with Federal Communications Commission (FCC) guidelines, to prevent fraudulent activities and ensure the integrity of our services. Below is an outline of our FCC-compliant KYC process:

Customer Identification:

Upon registration or initiation of services, customers are required to provide personal identification information, including:

- Full legal name
- Residential address
- Date of birth
- Government-issued identification number (e.g., Social Security Number, Driver's License Number)
- Business name and Address, etc.

Document Verification:

- Flow VOIP verifies the authenticity of submitted documents through reliable verification services or manual review by trained personnel.

Address Verification:

- For residential customers, address verification may involve comparing the provided address against public records or conducting address verification checks.
- Business customers may be required to provide additional documentation, such as utility bills or business licenses, to verify their business address.

Risk Assessment:

Flow VOIP conducts a risk assessment of each customer based on factors such as:

- Nature of service requested
- Transaction volume
- Geographic location
- Customer's history with Flow VOIP or other telecommunications providers
- Enhanced due diligence may be applied to customers posing higher risk, including additional identity verification measures.

Ongoing Monitoring:

- Flow VOIP implements ongoing monitoring of customer accounts and transactions to detect and prevent suspicious activities, including:
- Monitoring account activity for unusual patterns or high-risk transactions
- Conducting periodic reviews and updates of customer information
- Responding promptly to any suspicious activity or alerts raised by our monitoring systems

Compliance Reporting:

- Flow VOIP maintains records of customer identity verification and transaction monitoring activities as required by FCC regulations.
- We have established procedures for reporting suspicious activities or potential non-compliance with KYC requirements to relevant regulatory authorities.

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