

Voiceland S.A. Robocall Mitigation Plan

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I. Introduction

A. Background

- Briefly outline the prevalence and impact of illegal robocalls in the telecommunications industry.

B. Purpose

- State the purpose of the Robocall Mitigation Plan: to outline measures taken to avoid originating illegal robocall traffic and comply with FCC regulations.

II. Risk Analysis and Identification

A. Customer Traffic Analysis

- Carefully analyze customer traffic and business models to identify potential risks of robocalls, illegal activities, or scams.
- Implement robust Know Your Customer (KYC) procedures before onboarding new customers.

B. Monitoring and Analysis

- Regularly monitor call records, Call Detail Records (CDRs), and traffic data to identify key indicators of robocalling, such as call durations, traffic volumes, and caller IDs.
- Utilize advanced analytics tools to detect and analyze suspicious patterns.

III. Communication and Collaboration

A. Client Communication

- Establish effective communication channels with clients to address suspicions of robocalling promptly.
- Issue notices to clients engaging in unlawful robocalling activities, providing an opportunity to rectify the behavior.

B. Reporting and Cooperation

- Timely report any traceback requests from industry traceback groups or relevant regulators.
- Cooperate fully in investigations to prevent and terminate illegal robocalling originating from our network.

IV. Regulatory Compliance

A. FCC Regulations

- Stay updated with FCC regulations and guidelines related to robocalling.
- Develop and enforce policies to ensure compliance with FCC and other regulatory bodies.

B. FCC Robocalling Database

- Prioritize clients' registration with the FCC Robocalling Database.
- Ensure all clients provide proof of registration as part of onboarding and regularly check compliance.

V. Authentication Measures

A. STIR/SHAKEN

- Passthrough of STIR/SHAKEN headers for traffic not originating from our network. (reselling traffic)
- Ensure all remaining voice traffic is subject to the comprehensive Robocall Mitigation Program.

VI. Robocall Detection and Response

A. Software Enhancement

- Review and enhance the VOIP Switch to incorporate reporting features for identifying suspected illegal robocalls.

- Investigate and promptly respond to any identified attempts to originate unlawful robocalls.

B. Customer Notice

- Issue immediate notices to customers engaging in unlawful robocalling activities, requiring them to cease such actions or face service termination.

VII. Traceback and Cooperation

A. Commitment to Traceback

- Commit to responding to all traceback requests from the Industry Traceback Group (ITG), law enforcement, and registered traceback consortium.

B. Collaboration

- Collaborate with entities investigating and stopping any illegal robocalls using our service.

VIII. Continuous Improvement

A. Monitoring and Evaluation

- Establish ongoing monitoring and evaluation processes to continuously improve robocall mitigation measures.

B. Feedback Mechanism

- Implement a feedback mechanism to gather insights from customers and industry partners for continuous improvement.

IX. Conclusion

In conclusion, Voiceland is dedicated to implementing comprehensive measures to prevent and combat the pervasive issue of robocalls. Recognizing the disruptive and often fraudulent nature of robocalls, Voiceland has committed to taking every humanly

possible step to protect its users from the inconvenience and potential harm caused by these unwanted automated calls.

Voiceland employs advanced technologies and continuously updates its systems to detect and filter out robocalls effectively. Through a combination of intelligent call screening, machine learning algorithms, and ongoing monitoring, the company strives to stay ahead of evolving robocall tactics.

Furthermore, Voiceland actively collaborates with industry stakeholders, regulatory bodies, and law enforcement agencies to share insights and contribute to the development of broader solutions addressing the robocall epidemic. By participating in these collaborative efforts, Voiceland aims to create a safer and more secure communication environment for its users.

Voiceland understands the importance of user trust and is committed to providing a reliable and spam-free communication experience. As technology and regulations evolve, Voiceland remains agile, adapting its strategies to stay at the forefront of robocall prevention, demonstrating a firm dedication to the well-being and satisfaction of its user community.