

Smplsolutions

ROBOCALL MITIGATION PLAN

Smplsolutions is a reseller of voice over Internet Protocol (VoIP) service. Our wholesale network provider is Reinvent Telecom (RMD0004216). This Robocall Mitigation Plan describes the specific reasonable steps that Smplsolutions has taken to avoid the origination, carrying, or processing of illegal robocall traffic on our wholesale provider's network.

We have not been prohibited from filing a certification in the Robocall Mitigation Database.

Smplsolutions, nor any of our executives or principals, have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

Smplsolutions has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

As part of its onboarding process for business customers, Smplsolutions undertakes various commercially reasonable precautions prior to entering into a formal written agreement. All prospective business customers participate in an in-person or telephonic enrollment/contract process. In addition, Smplsolutions investigates the prospective business customer's background, taking steps such as checking for a company website, determining how long the business has been operating, and confirming their corporate status with the applicable State Secretary of State's office or website, along with other indications of a legal, operating business. Smplsolutions collects and as needed, verifies the following data on prospective business customers as part of its investigatory process:

- Physical business location - 20503 Crescent Bay Drive, Lake Forest, CA 92630
- Contact person(s) - David Case, Support@smplsolutions.com, 949-544-8640
- State or country of incorporation - California, United States of America
- Federal tax ID number - 33-0838562
- General nature of the business - Reseller of voice over Internet Protocol (VoIP) service

In addition, if Smplsolutions were to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

Furthermore, Smplsolutions has an Acceptable Use Policy which contains provisions that allow us to suspend or terminate the services of a customer engaged in illegal robocalling or otherwise abusing our services.

“Know-Your-Upstream Provider” Procedures

Smplsolutions relies upon the “Know-Your-Upstream Provider” procedures of its wholesale provider, Smplsolutions is confident that Reinvent Telecom exercises due diligence before accepting traffic from an upstream provider.

Use of Call Analytics Systems

Smplsolutions relies on the analytics software of its wholesale provider, Reinvent Telecom, to alert us to any suspicious calling patterns that suggest a customer may be engaged in illegal robocalling.

- Combining behavioral analytics, caller authentication and verification, our solution features:
 - **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
 - **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
 - **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
 - **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
 - **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
 - **Do Not Call Registry:** We comply with the FTC’s rules for the Do Not Call Registry.
 - **Do Not Originate:** We block calls based on a reasonable do-not-call list.

Commitment to Respond to Traceback Requests

Smplsolutions commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.