



Robocall Mitigation Plan

This robocall mitigation plan is for Verge Network Solutions, LLC (Verge) with headquarters at 12308 Hidden Forest Blvd, Oklahoma City, OK 73142.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.

Verge has not been prohibited from filing a certification in the Robocall Mitigation Database.

Verge does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

Verge uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

Being a small VoIP provider, Verge has direct interaction with all Verge subscribers at the time-of-service installation and does not provide virtual or remote services to any customers that are not known or vetted by Verge.

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

Verge's acceptable use policies do not permit robocalls originating from the Verge network by any subscriber.

Verge does not offer any services that engage large volumes of outbound calls.

Verge does not sell voice services to international call originators.

Verge maintains appropriate call logs to investigate, confirm, preserve and react to robocall violations.

If Verge identifies, has reason to suspect, or is notified of traffic patterns consistent with illegal robocalls or spoofing, Verge seeks to identify the party that it is using the network to originate, route, or terminate these calls and takes appropriate action.

Appropriate action may include:

- Validating that the originating party is authorized to use the originating telephone number.
- Notifying the registered subscriber of the originating telephone number that inappropriate activity may have occurred.
- Suspending the calling party's ability to originate, route, or terminate calls on QCOL's network.



Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Verge works closely with intermediate carriers which are certified and which have implemented their own STIR SHAKEN or Robocall Mitigation Program.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

STIR/SHAKEN

We have registered with the STI-PA using OCN 765J. We have our own STIR/SHAKEN certificate issued by Neustar that we use when authenticating calls we originate.