

MobilitySnap LLC - Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by MobilitySnap LLC. Pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC), which require all “voice service providers” to establish a “robocall mitigation plan.” This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

TRACEBACK COOPERATION

1. MobilitySnap LLC (the company) will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocalls, the companies will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement or other entities. The companies have identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 48 hours.

SUBSCRIBER VETTING PRACTICES

1. Residential and small business practices
 - a. The companies will vet residential and small businesses through normal business practices and will obtain billing addresses, primary residences, or business locations.
2. Commercial retail end-users
 - a. The companies will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer’s business.
3. The companies have call detail records to determine typical call volume and potential reasons for significant deviations from it. They will determine if there are legitimate reasons for any customer to be making a number of high-volume, short-duration calls. The companies will contact any commercial business within 24 hours of such deviations to determine if call volumes are legitimate.

TELEPHONE NUMBER VALIDATION PROCESS

1. Telephone Number Validation is necessary and appropriate when the VSP does not know an End User’s right to use the telephone number. The companies will validate as necessary and appropriate.

INTERNATIONAL PRACTICES

1. The companies will continue to monitor best practices and implement as needed.

ONGOING MITIGATION PRACTICES

1. The Company will investigate suspicious calls and patterns of calls. If the company detect a pattern consistent with illegal robocalls, or if the company otherwise have reason to suspect illegal robocalling or spoofing is taking place over our network, the company will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying law enforcement authorities.

ROBOCALL MITIGATION

1. The company, through their call records and the real-time analytics of a third party vendor, will deploy best efforts to monitor the following as part of its robocall mitigation techniques:
 - a. Monitor high-volume subscriber traffic
 - b. Large bursts of traffic in small timeframes Inconsistent volumes of traffic (spikes)
 - c. Low call duration and low completion percentages High volume of calls from invalid numbers Sequential dialing patterns
 - d. Monitor suspicious calls and calling patterns
 - e. Any subscriber generating high volumes of non-business hour traffic
 - f. Calls with blocked or unauthorized numbers
 - g. High call volumes to do-not-call registry or invalid numbers Free call blocking and labeling