

3C Network Strategies For Telemojo
Telecommunication Services Robocall Mitigation Plan

This **Robocall Mitigation Plan** is submitted by 3C Network Strategies facilitating our phone services that are branded as Telemojo according 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 to avoid the origination of illegal robocalls on its network, and to cooperate with such entities in investigating and stopping robocalls that may use its service to originate calls.

1. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, the Provider’s status concerning STIR-SHAKEN implementation is as follows:

The Provider has not implemented the STIR/SHAKEN authentication framework on any portion of its network and all calls originating on its network are subject to the policies and procedures outlined in this Robocall Mitigation Plan which are intended to stop anyone from using the Provider’s service to originate illegal robocalls.

At this time we rely on the continuing extension from STIR-SHAKEN implementation provided under 47 CFR § 64.6304 (d) which exempts from STIR-SHAKEN Caller ID Authentication those portions of a voice service provider network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP. With this filing, we will be eligible for our provider to obtain our certificates to become compliant with STIR/SHAKEN authentication.

2. TRACEBACK REQUESTS

As noted above, we will cooperate with the FCC law enforcement on traceback requests. To allow for timely and comprehensive law enforcement response efforts against illegal robocalls

3. CUSTOMER VETTING PRACTICES

We provide all Direct Inward Dialing (DID) numbers and associated numbers to their Caller ID for outgoing calls. We don’t provide services to companies or people that broadcast calls by machine or software. We provide business phone system services where one call is received and one call is placed.

Our customers don’t have a way to assign their caller ID to forge or spoof other phone numbers that don’t belong to that person or company. We confirm the identity of

customers using its voice services by collecting information such as physical customer location, contact person(s), state or country of incorporation, and the nature of the business.

4. TELEPHONE NUMBER VALIDATION PRACTICES

We require the existing phone bill or invoice of the customer to verify their 'ownership' of a phone number by establishing a history of ownership and the ability to pay other existing providers for access to the public telephone network (PSTN).

Telephone Number Validation refers to the confirmation of the customer or end-user right to use a telephone number in connection with their subscribed voice service(s). A subscriber of Temojo services is permitted to use a telephone number as their caller identity if a number is directly managed by us.

5. INTERNATIONAL CALL ORIGINATORS

The Provider is not currently an international voice services provider.

6. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

We have longstanding relationships with these upstream providers and maintain an awareness of the nature of their businesses and the quality of their telephony services to provide the highest quality services to all of our customers. This includes the use of robocall prevention language in any contracts that we may directly have with any upstream providers.

7. ONGOING ROBOCALL MITIGATION PRACTICES

We monitor the usage of our network and customer traffic in real-time and in call detail records (CDRs). When network usage patterns consistent with robocalls are detected or we otherwise suspect robocalling or spoofing is taking place on its network we identify the party that is originating, terminating, or routing these calls so that it may take appropriate action.

8. THIRD-PARTY ANALYTICS

Using call analytics from our Upstream Providers contained in Appendix A we prevent the origination of robocalls on its network to minimize the chance of customers misusing our services.

Configuring the PBX phone system for our customers resolves most of the problems with their ability to misuse our services.

Appendix A

Traceback Request Single Point of Contact:

Name: Sherif Abouseda

Title: owner

Phone Number: 559.779.9392

Email Address: sherif@3cns.com

Upstream Provider Information:

Name of Upstream Provider: Sangoma

Nature of Business: SIP Trunk provider

Location of Upstream Provider: Markham, ON, CA

Name of Upstream Provider: Twilio

Nature of Business: Programmable Telecomm

Location of Upstream Provider: San Francisco, CA, US

Name of Upstream Provider: Signalwire

Nature of Business: Programmable Telecomm

Location of Upstream Provider: Palo Alto, CA, US