

ProspectBoss LLC - Know Your Customer Robocall Mitigation Plan

We adhere to the best practices for vetting caller identity outlined by the NANC Call Authentication Trust Anchor Working Group.

(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

We promptly respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, and cooperate with such entities in investigating and halting any illegal robocallers that utilize our service to originate calls.

STIR/SHAKEN Extensions

We qualify for and are utilizing the STIR/SHAKEN implementation extension received under 47 CFR § 64.6304 as we have fewer than 100,000 voice subscriber lines. All voice traffic originating on our network is subject to the robocall mitigation program detailed below.

Robocall Mitigation Program

We employ software provided by Commio /VoIP Innovations to monitor our outbound voice traffic in real-time, preventing the origination of illegal robocalls.

Utilizing behavioral analytics, caller authentication and verification, our solution includes:

- Fraud Detection: Identifying high volume robocalling, spoofing, and spam call activity.
- Subscriber Notification: Implementing Caller ID Name override to alert subscribers of suspicious calls.
- Call Blocking Support: Enabling accurate identification for blocking fraudulent phone calls in accordance with the TRACED Act (2019).

- Business Number Verification: Registering legitimate business numbers to prevent inadvertent call blocking.
- Caller ID Name Service: Seamlessly integrating Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when the call is determined fraudulent.

Additionally, we have instituted a Call Abuse Policy and have made the following policy available on our website, terms of use, and have informed our customers of the policy as detailed below:

"Any call originated on the ProspectBoss LLC - Know Your Customer network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from ProspectBoss LLC - Know Your Customer network, may be subject to further investigation by the FCC for enforcement of the TRACED Act, and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court."