

Robocall Mitigation Process

Transit Voice is a wholesale carrier, reselling international and US Domestic telephone calls to both foreign and domestic carriers. In compliance with 47 CFR §64.6301, Transit Voice has performed the following Robocall Mitigation procedures:

STIR/SHAKEN:

- ❖ Transit Voice's network will be able to pass STIR/SHAKEN tokens as they come.
- ❖ Transit Voice will not be modifying or changing the level of certification received.
- ❖ Transit Voice has the ability to block calls that are either not signed with STIR/SHAKEN or that have an incorrect certificate.
- ❖ Transit Voice is actively blocking unsigned calls from upstream carriers it deems should have been able to or that were obligated to sign.

ROBOCALLING:

- ❖ Transit Voice has implemented several network wide restrictions meant to curb any potential short duration traffic such as:
 - Transit Voice has a network wide ANI Blacklist. All calls from these ANI's are blocked.
 - If a trunk receives more than 100 calls from the same ANI Transit Voice will evaluate the ASR, ACD, and Short Duration Percentage (SDP). If any of these parameters are below the set thresholds, the ANI will be blocked in the switch for a period of twenty-four hours.
 - If a call comes from a "Neighboring" number, meaning the NPA-NXX is the same on both the ANI and DNIS, such call will be blocked.
- ❖ If Transit Voice finds that there is suspicious traffic that has a mix of short duration and long duration calls, Transit Voice will increase the level of scrutiny of the calls by implementing additional steps:
 - Blocking of any call in the DNC list
 - Blocking of any call with a U.S. Wireless ANI
 - Blocking of any call to a US Wireless DNIS
 - Blocking of inbound Media IPs that are well known to produce fraud calls
 - Blocking based on SOMOS DNO lists

YouMail:

- ❖ Transit Voice is subscribed to YouMail.
- ❖ YouMail provides a real-time database that scores the probability of an ANI producing SPAM, Fraud, or calls violating TCPA regulations.
- ❖ Transit Voice find that approximately 15%-20% of calls we receive are blocked by this system.

Know Your Customer (KYC):

- ❖ Transit Voice provides service to carrier customers and requires potential carrier customers to complete a comprehensive Profile questionnaire which includes their legal information, filer and exemption information, industry and financial references, as well as other pertinent data to verify that the customer carrier is a registered Intermediate Provider in good standing and certified to provide telecommunication services.
- ❖ If Transit Voice finds that the carrier customer is violating the restrictions above and the carrier customer fails to remediate and detail the case of said irregularities, Transit Voice will take action such as suspension or termination of interconnection.

ITG:

- ❖ Transit Voice will comply with TOP priority any traceback response required by US Telecom Industry Group (ITG) in the shortest possible time frame.
- ❖ Transit Voice will also communicate to the Carrier Customer about the traceback, and we will implement a probatory period where no more tracebacks will be allowed.

Transit Voice's Role in the call chain:

- ❖ Transit Voice is an intermediate provider
 - Transit Voice receive calls from either gateway providers or other intermediate providers.
 - Transit Voice send calls to other intermediate providers.
 - Transit Voice does not originate or has no agreements with carriers that require calls to be signed by Transit Voice.
 - Transit Voice do not sell DID's.
 - Transit Voice do not have Carrier Customers that originate their own calls (Transit Voice do not act as a gateway).

RMD Filing:

- ❖ Transit Voice is not prohibited to file in the RMD.

FCC investigations:

- ❖ Transit Voice is not and has not been part of any formal FCC, law enforcement, or regulatory agency action or investigation within the last two years due to suspected unlawful robocalling or spoofing.