

Hello Hello Miami LLC Robocall Mitigation Plan

This Robocall Mitigation plan is submitted by Hello Hello Maimi 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 plan describes Hello Hello Maimi LLC current policies and procedures designed to reduce or eliminate illegal robocalls from traversing its network. In addition to following these steps, Hello Hello Maimi LLC commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group, and to cooperate with these entities in investigating and stopping any illegal robocalls that may use its service.

1. Stir-Shaken Implementation

Hello Hello Maimi LLC has fully implemented the STIR/SHAKEN authentication framework on its network. All calls that traverse our network must be signed with a minimum of a “C” attestation prior to reaching our network to be routed to our downstream carriers. Any unsigned calls are blocked from traversing our network.

2. Traceback Requests

Hello Hello Maimi LLC will cooperate with the FCC, law enforcement and the Industry Traceback group on all traceback requests and investigations.

All traceback requests will receive a response within the 24-hour window.

In addition to the automated traceback tickets generated by the ITG, Hello Hello Maimi LLC.com will also open internal tickets with any customer/upstream carriers identified in the traceback.

All customers/upstream carriers must respond to traceback requests within the 24-hour window or face immediate account suspension.

If 3 or more traceback requests of different campaign types or dates lead back to the same customer/upstream carrier within 30 days, they will have their account suspended for 90 days.

3. Customer Vetting Practices

In an effort to minimize or prevent illegal robocalls from traversing our network, Hello Hello Maimi LLC will use its best practices to vet the identity of all of its customers/upstream carriers. Hello Hello Maimi LLC attempts to confirm the identity of its potential customers by collecting KYC information such as physical customer location, billing address, state or province, country, year of incorporation, contact person(s), federal tax ID, 499 ID, and RMD number.

In addition to vetting the identity of potential customers, Hello Hello Maimi LLC also collects the following information regarding:

- The nature of the customer's business.
- Traffic profile.
- Do they actively participate in the traceback process?
- Have they been determined to be a "Non-Cooperative Voice Service Provider"?
- Have they been determined to be a "bad-actor upstream voice service provider"?
- Have they ever had an adverse judgement against them in a civil lawsuit alleging claims under the TSR, the TCPA, or any other lawsuits regarding Robocalls, automated dialing, calls to the DNC Registry or the do not call registry of any state, spoofed caller ID numbers, or otherwise unlawful telemarketing or solicitations.

As part of its efforts in vetting potential customers Hello Hello Maimi LLC will require all customers/upstream carriers to provide trade and credit references.

4. Ongoing Robocall Mitigation Practices

Hello Hello Maimi LLC currently uses the SipNav soft switch platform. SipNav provides its users with a robust selection of robocall mitigation services such as:

- Call filtering to block invalid originating numbers, neighborhood dialing, and numbers on the Somos® DNO list from traversing our network.
- The ability to block all calls that have not been signed via STIR SHAKEN from traversing our network.
- Block lists to input originating or terminating numbers that appear in carrier tickets to prevent continuing abuse.
- Global block lists maintained by the platform provider that include originating or terminating numbers, and media IP addresses that have been identified in ITG tracebacks and FCC enforcement actions.
- We also utilize the Roboguard service by FraudCentral.io which identifies, and blocks known "Bad Actors" in real time.

Hello Hello Maimi LLC monitors the usage of its network and examines call detail records (CDRs) for the purpose of detecting suspicious call activity and/or calling patterns. When we detect or are notified of suspected illegal robocalling or spoofing we seek to immediately identify the customer/upstream carrier routing those calls so that we may take the appropriate action. The actions taken can include but are not limited to blocking the originating and terminating numbers pending investigation, immediately notifying the upstream carrier routing the calls of the issue and verifying the amount of traffic being received from our customer's client(s).

Continued occurrences of routing calls which violate the TSR and TCPA will lead to our termination of their accounts.

Appendix A

I. Traceback Request Single Point of Contact:

Name: Luis Leon

Title: CEO

Phone Number: 786 505-4435

Email Address: luisleon@hellohellomiami.com

II. Description of Federal Trade Commission Civil Investigative Demand.

We received an FTC CID on October 6th, 2023. The purpose of the CID was to determine the violations of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b), 56(a), and 57b, the Telemarketing and Consumer Fraud and Abuse Prevention Act ("Telemarketing Act"), 15 U.S.C. § 6105, and the Telemarketing Sales Rule ("TSR").

The case concluded in a order to pay to the Treasurer of the United States \$211,275.69