



Summary

The Federal Communications Commission requires all voice service providers to file robocall mitigation plans and detail the reasonable steps they take to mitigate/protect against robocalls. The FCC requires voice service providers to implement STIR/SHAKEN and those who lack control over network infrastructure necessary to implement STIR/SHAKEN to have taken "reasonable steps" to mitigate illegal robocalls.

This plan details the practices Apollo Cloud has in place to significantly reduce the carrying, processing or origination of illegal robocalls

Apollo Cloud overview

Apollo Cloud act as a reseller of voice services, therefore, do not have control over the network infrastructure in order to implement STIR/SHAKEN. Apollo Cloud has a reseller agreement with Bandwidth Inc (d/b/a Voxbone) and work with them to provide the network infrastructure to their global users. Bandwidth implemented STIR/SHAKEN in their network in December 2019 FCC registration 0031092331) and they're currently signing over 4 billion calls each month. They've established interoperability with major carriers and other enhancements that will support compliance with STIR/SHAKEN.

Compliance steps

Know your customer

Apollo Cloud are a low volume business and therefore have a detailed knowledge of and a close understanding of each of our customers operations.

Apollo Cloud undertake the following due diligence on our customers:

- Credit check
- Business name and address verification

Apollo Cloud has specific terms and conditions governing the reselling of voice services to its customer and the terms detail comprehensive prohibited activities. Please find below the specific Claus within the agreement: 3.2 The Customer shall ensure that the Service is not used either by the Customer or any third party for any fraudulent, criminal, defamatory, offensive, obscene, indecent or abusive purpose (including menacing, nuisance or hoax calls) or so as to constitute a violation or infringement of the rights (including intellectual property rights) of Apollo Cloud or any third party. The Customer hereby undertakes to comply with all applicable laws, regulations, conditions of entitlement and guidelines and all reasonable instructions of Apollo Cloud in relation to its use of the Service and the Service Equipment. The Customer shall not use the Service in a manner in which, in Apollo Cloud's reasonable opinion, could materially affect the quality of the electronic communications service over a public electronic communication network, including the Service.

Apollo Cloud have the right to terminate or suspend services if it finds the end user violates any terms or undertakes any fraudulent activity.

Protection during service

Apollo Cloud uses carriers that, are fully compliant with relevant regulations in any country that Apollo Cloud provides service.

Apollo Cloud have a fraud monitoring services for all customers to assist with the prevention of fraud whereby our providers will alert us of any abnormal activities and Apollo Cloud will act on those alerts quickly.

Apollo Clouds provider for USA Originated calls is Bandwidth who has the STIR/SHAKEN plan in place as detailed above. In addition, Apollo Cloud has procedures in place to alert us of abnormal usage activity.

Apollo Cloud Solutions





Apollo Cloud uses VoiceHost and Gamma Communications as its primary UK Providers. Voice Host and Gamma Communications are both registered with the FCC and have a rigid fraud monitoring system which will automatically shut down a service if it detects any abnormal activity.

Responding to Traceback Requests

Apollo Cloud is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the USTelecom's Industry Traceback Group and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Apollo Clouds employees have been briefed on the traceback and obligations. Apollo Cloud maintains current and correct information about its customers so that it can provide accurate responses to traceback requests.

