

Robocall Mitigation Policy

Robocall Mitigation Compliance with Traced Acts

Date: 14/5/2024 **Company:** M247 LTD **Version:** 1

Objective

To establish and follow a procedure and policy that is compliant with the **TRACED Act**.

Overview

The FCC requires all providers that originate and terminate calls using the NANP to certify in the Robocall Mitigation Database their status for compliance. If not compliant the operator should implement a Robocall Mitigation plan.

The FCC requires voice service providers to develop a Robocall Mitigation Plan that:

- Details the reasonable steps taken to avoid originating illegal robocalls.
- Demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls.
- Is filed in the Robocall Mitigation Database

M247 is a small service provider in UK and is exempt from the Stir Shaken requirements of §64.6301 as we do not directly originate call into the USA.

Prohibition of Illegal Robocalling

Our TOS prohibit the use of robocalling, and we have procedures in place to limit excessive calling

1. In house analysis allow M247 to mitigate in progress Robocalls by:
 - a. Rate limiting the number of calls per second per endpoint to limit the impact of robo calling if it happens on our network.
 - b. Set the limit on call costs in a rolling 20-minute period blocking endpoints totally if they exceed limits
2. Our platform is only a B2B/B2C service, and clients will need to provide information to prove that are legitimate business before we provide a service.
3. Businesses with large volume calling are vetted to ensure they do not overwhelm our platform and the onward carriers' platforms.
4. M247 provide Voice services for a small number of clients and all of these are account managed and are reminded through our account management process of their responsibilities and maximum call capabilities.

Traceback and Enforcement

M247 will utilize the existing RIPA process to cooperate with FCC, law enforcement and ITG to investigate and stop illegal robocalls.

When requesting tracing please email ripa@m247.com and mark the request as a Grade 1 response. This will dedicate sufficient engineering time to provide prompt investigation and resolution.